

**UNIVERSITY BANK
CRA PUBLIC FILE**

As of 03-31-2024

SECTION A
FDIC APPROVED
CRA STRATEGIC PLAN



Federal Deposit Insurance Corporation
Division of Depositor and Consumer Protection
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December 20, 2021

Board of Directors
University Bank
2015 Washtenaw Avenue
Ann Arbor, MI 48104

Subject: Community Reinvestment Act (CRA) Strategic Plan Approval

Members of the Board:

This letter is to inform you that the FDIC approved the CRA Strategic Plan (Plan) last submitted on December 8, 2021, by University Bank (Bank) via e-mail from Chief Administrative Officer Tami Janowicz. The effective date of the Plan is January 1, 2022, for a term of three years. A copy of the Plan is enclosed for your records.

Section 345.27(a)(4) of the FDIC's Rules and Regulations requires the Bank to operate under the Plan for at least one year before the FDIC can evaluate your institution's performance under the Plan. Therefore, the earliest that our agency will evaluate the Bank under the Plan is January 1, 2023. Our approval is based primarily on the Bank's lending commitments and supported through the community development investment and service goals. If there are any modifications to the Bank's business strategy during the Plan's duration that may have a material effect on the approved performance targets, you must advise the Chicago Regional Office to determine whether an amendment to the Plan is appropriate. Should you subsequently decide to terminate the Plan or upon expiration of the Plan, the FDIC will evaluate the Bank under the standards listed in Section 345.26 for an intermediate small institution.

In addition, please be advised that Part 345 of the regulation addresses the impact of discriminatory or other illegal credit practices on an institution's CRA rating. The presence of these credit practices may adversely impact an institution's CRA rating, irrespective of the achievement of the CRA goals established in the Plan.

Thank you for your cooperation during the review process. If you have any questions, please contact Senior Review Examiner Steve Murphy at (312) 382-7535 or stmurphy@fdic.gov.

Sincerely,
Teresa M. Sabanty
Deputy Regional Director

Enclosure

cc: State



**Community Reinvestment Act
Strategic Plan
2022 – 2024**

Introduction

The Community Reinvestment Act (“CRA”) regulations provide that a financial institution may elect to have its CRA performance evaluated under the strategic plan option. The strategic plan option enables the institution to tailor its CRA goals and objectives to address the needs of its community consistent with its business strategy, operational focus, and capacity and constraints. University Bank (“UB” or the “Bank”) has elected to establish a strategic plan with a 3-year term, effective January 1, 2022, and will have its CRA performance evaluated under this plan. It is the belief of the Bank that the plan will provide an accurate indication of the Bank’s success in meeting the credit needs of its assessment areas. The use of a strategic plan will permit the Bank to emphasize community development lending, investments, and services necessary to meet the credit needs of its assessment areas, while providing an evaluation method that measures the Bank’s success in these areas without being negatively skewed by the Bank’s nationwide mortgage lending program and related nationwide or regional business activities that exceed the scope of activities normally contemplated in the CRA.

Purpose of the Community Reinvestment Act

The CRA is intended to encourage depository institutions to help meet the credit needs of the communities in which they operate, including low- and moderate-income neighborhoods, consistent with safe and sound operations. It was enacted by the Congress in 1977 (12 U.S.C. 2901) and is implemented by Part 345 of the FDIC Rules & Regulations (12 CFR 345). The regulation was substantially revised in May 1995 and updated again in August 2005.

The CRA requires that each depository institution's record in helping meet the credit needs of its entire community be evaluated by the appropriate Federal financial supervisory agency periodically. Members of the public may submit comments on a bank's performance. A bank's CRA performance record is taken into account in considering an institution's application for deposit facilities.

Intended Use of the Strategic Plan

This Strategic Plan outlines the means by which University Bank will achieve compliance with the requirements of the CRA via a combination of targeted lending, investment, donation, and service hour activity commensurate with the Bank’s share of local deposits within its defined assessment area (AA) of Washtenaw County, Michigan. The Plan will provide a brief analysis of the market environment and competitive factors within the assessment area, the Bank’s core business operations, and the Bank’s plans and goals for demonstrating comprehensive compliance with the CRA.

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Institution Background & Profile

Bank Profile

UB is a community bank headquartered in Ann Arbor, Michigan, and wholly-owned by University Bancorp, Inc., a one-bank holding company also located in Ann Arbor, Michigan. The bank operates in Washtenaw County in southeastern Michigan. UB received a Satisfactory rating at its previous CRA Performance Evaluation dated June 21, 2021. One full-service branch operates within the main office, in an upper-income census tract. UB opened a Loan Production Office (LPO) in 2021 in a middle-income census tract in Ypsilanti, Michigan. UB offers various deposit products and mortgage, commercial, and consumer loans.

Bank Operations

University Bank principally operates from its main facility in Ann Arbor, Michigan located at 2015 Washtenaw Avenue and the Ypsilanti LPO located at 301 W. Michigan Avenue. In addition, the Bank maintains two non-deposit taking administrative facilities: 2755 Carpenter Road, Ann Arbor, MI and 29777 Telegraph Road, Southfield, MI. These administrative facilities house staff engaged in shared backroom services for the Bank and its divisions and operating subsidiaries. These shared services include Human Resources, Deposit Operations and Compliance, Accounting and Finance, as well as Secondary and Capital Markets.

Principal lines of business for University Bank involve traditional lending activities, principally focused on residential lending within the Bank's market area, as evidenced by the concentration of 1-4 Family residential real estate loans in the bank's portfolio (totaling 76.3% of the loan portfolio as of December 31, 2020). As noted, in addition to in-house residential lending activities, University Bank also owns a controlling interest in subsidiary entities engaged in robust mortgage origination activities, which are principally focused on origination of mortgages eligible for sale on the secondary mortgage market. These subsidiary entities include University Lending Group and UIF Corporation, which are both characterized as affiliates for CRA purposes, as further detailed below. Finally, the bank also lends in other areas, such as commercial real estate (15.1% of the loan portfolio); however, these activities are secondary lines of business in contrast to the bank's residential real estate lending activities.

The Bank's Midwest Loan Services, a subsidiary of UB until 2016, is now a division of the bank and provides loan servicing and subservicing for financial institutions across the county. This division is a provider of mortgage sub-servicing to over 390 clients, mainly comprised of credit unions, and some banks and mortgage companies. Over 50 percent of the credit unions that the company serves are designated as low-income credit unions. To qualify as a low-income credit union, a majority of the credit union's membership (50.01 percent) must meet certain low-income thresholds, based on data from the Census Bureau and requirements outlined in the NCUA's Rules and Regulations.

Additionally, the Bank has two subsidiaries, University Lending Group, LLC (ULG) and UIF Corporation (UIF) which are primarily engaged in originating home mortgage loans. ULG is primarily a conventional retail lender and originates loans under most government supported programs such as FHA, VA, RD and other State bond programs that support first home buyers and others. UIF provides non-traditional faith-based home financing products to clients with

religious beliefs that prohibit them from engaging in “interest-based” lending programs. University’s subsidiaries have a combined 24 Loan Production Offices (LPOs) located in 10 States which include Michigan, Florida, New Jersey, Illinois, Virginia, Texas, Washington, California, and Tennessee.

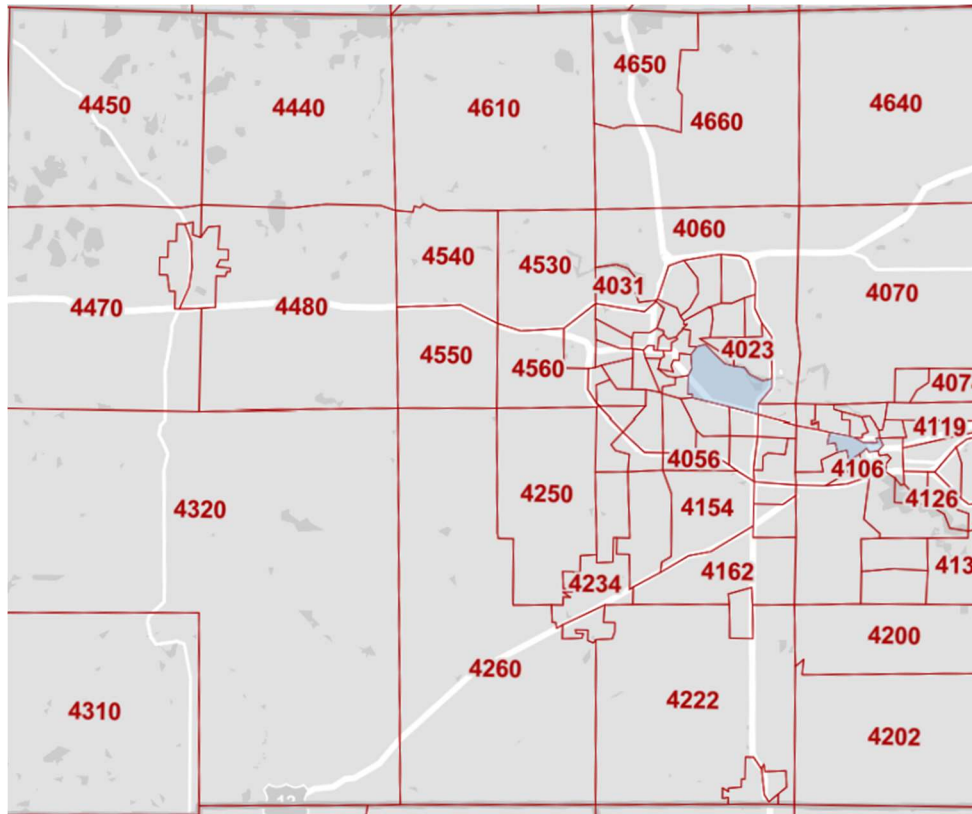
In general, and as further reflected in this self-assessment, the community bank business unit comprises a relatively small subset of the operations of University Bank. This department includes approximately 23 full- and part-time staff, contributes less than three percent (3.0%) of the Bank’s deposits by dollar volume, and less than twenty (20%) percent of the loan portfolio by dollar volume. Further information regarding the nature of this portfolio is detailed in the Market Competition section of this Plan below.

Branch & ATM Network

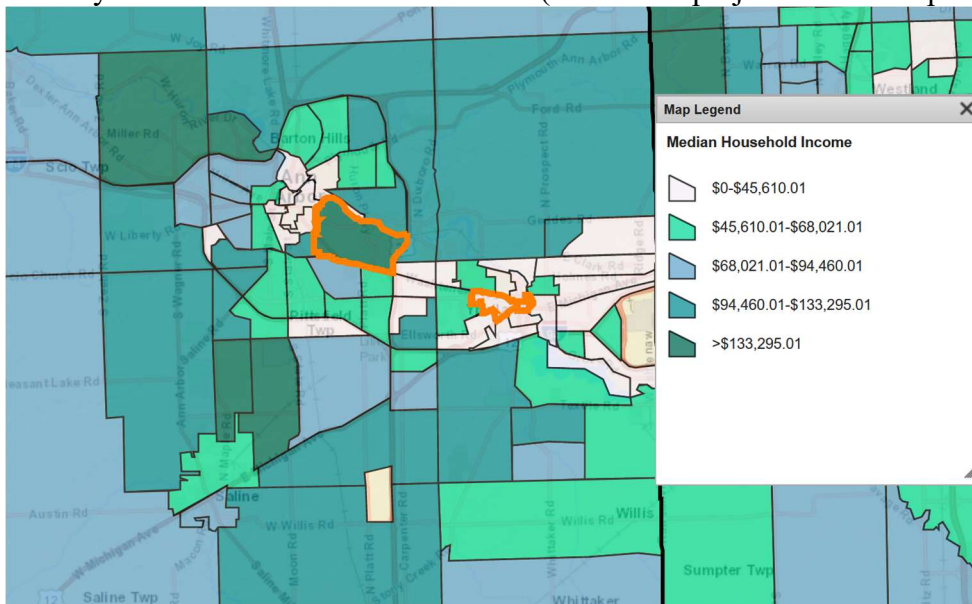
The present structure of the Bank’s branch network is detailed in the matrix below (information provided as of December 31, 2020).

Branch / ATM	Location	County	Branch CT Income Level
Full Service Branch Locations			
Ann Arbor	2015 Washtenaw Avenue Ann Arbor, Michigan 48104	Washtenaw	Upper
Other Locations			
Ypsilanti LPO	301 Michigan Avenue Ypsilanti, Michigan 48197	Washtenaw	Middle
Automated Teller Machines			
Bear Claw (Depository ATM)	2460 Washtenaw Avenue Ann Arbor, MI 48104	Washtenaw	Upper
Pot Belly	300 S State Street Ann Arbor, MI 48104	Washtenaw	Unknown
Ypsilanti (Depository ATM)	301 Michigan Avenue Ypsilanti, Michigan 48197	Washtenaw	Middle

A map of the AA of Washtenaw County, which is also the sole county in the Ann Arbor Metropolitan Statistical Area (MSA), is detailed below (census tracts with a branch location or LPO are highlighted):

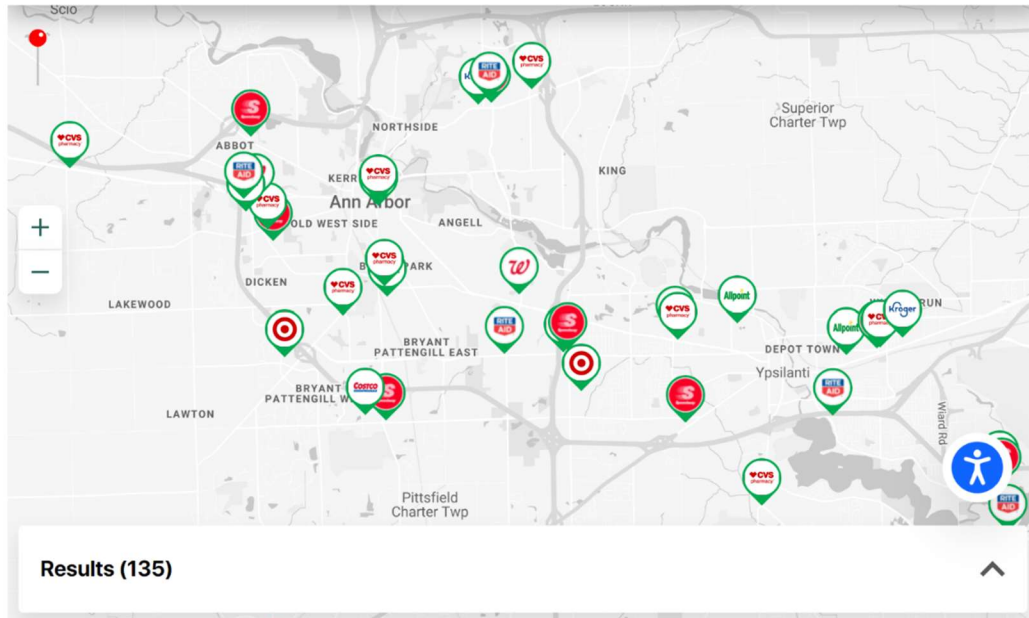


The following map also details a portion of the AA with the same tracts as referenced in the map above; however, the map also depicts estimated median household income projections for the immediate locality of the branch and LPO locations (2019 ACS projections developed by HUD).



In addition to the present network of branch locations and loan production offices, University Bank also maintains an extensive network of automated teller machines (ATMs) throughout Washtenaw County for use by bank customers and other consumers present within the

communities of the region. This network is comprised of both on-site and other bank-owned and administered ATMs, as well as ATMs in the Allpoint ATM network, which provide free services to University Bank customers. A map to illustrate the coverage of this network, including 3rd party ATMs, is provided below. Based upon the results of a search based upon Washtenaw County, the Allpoint ATM locator service indicates there are 135 ATMs within the county, which appear to be reasonably dispersed and available to consumers within the designated AA.



Loan Portfolio Composition

According to the Call Report dated March 31, 2021, the institution reported total assets of approximately \$658.5 million, total loans of \$304.9 million, total deposits of \$538.1 million, and total securities of \$3.0 million. UB experienced significant growth within all balance sheet categories in recent years. For example, as of December 31, 2014, total assets were \$127.0 million and total loans were \$91.6 million. Through the present period, total assets increased by 418.5 percent and total loans increased by 232.9 percent. On a more recent time horizon, total assets as of December 31, 2017 were \$226.8 million and total loans were \$119.5 million. The institution’s strong growth includes significant increases in the volume of mortgages originated and sold on the secondary market, while retaining servicing. The following table illustrates the loan portfolio distribution as of March 31, 2021. For illustrative purposes, the 2021 CRA examination considered the following portfolio:

Loan Portfolio Distribution as of 03/31/2021		
Loan Category	\$(000s)	%
Construction, Land Development, and Other Land Loans	9,208	3.0
Secured by Farmland	0	0.0
Secured by 1-4 Family Residential Properties	221,701	72.7
Secured by Multifamily (5 or more) Residential Properties	661	0.2
Secured by Nonfarm Nonresidential Properties	46,455	15.2

Total Real Estate Loans	278,025	91.1
Commercial and Industrial Loans	17,465	5.7
Agricultural Production and Other Loans to Farmers	0	0.0
Consumer Loans	174	0.1
Obligations of State and Political Subdivisions in the U.S.	0	0.0
Other Loans	9,274	3.0
Lease Financing Receivable (net of unearned income)	0	0.0
Less: Unearned Income	0	0.0
Total Loans	304,938	100.0
<i>Source: Reports of Condition and Income 03/31/2021. Due to rounding, may not equal 100.0%</i>		

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Assessment Area Analysis & Performance Context

General Demographics

University Bank has delineated one distinct AA for purposes of examination under the requirements of the CRA. This AA is comprised of Washtenaw County, Michigan, which solely comprises the entirety of the Ann Arbor Metropolitan Statistical Area (MSA). Within this county, University Bank has designated all census tracts as its AA. This AA, with a population of 354,092, is located in southeast Michigan, southwest of Detroit, Michigan, the largest major metropolitan area in the State of Michigan. The bank's main office is located in Ann Arbor, Michigan, which is the county seat of Washtenaw County and has a population of 113,934 as of the 2010 census. Washtenaw County is the home of the main campus of the University of Michigan and its wholly owned academic medical center Michigan Medicine, as well as Eastern Michigan University and Washtenaw Community College. In addition to medical and educational institutions, the city features a mixed industry of retail, industrial, service-oriented businesses, and non-profits, including another large hospital, as well as other governmental services. Based on information from Crain Communications, a Detroit-based publisher, the following entities are the largest reported employers in Washtenaw County:

Largest Employers - Washtenaw County	
<i>with greater than 1,000 employees</i>	
Employer	# of Employees
University of Michigan	33,225
Trinity Health	7,435
United States Federal government	3,060
Ann Arbor Public Schools	2,225
Faurecia North America	2,178
Eastern Michigan University	1,559
IHA Health Services	1,442
State of Michigan	1,409
Washtenaw County	1,264
Thomson Reuters	1,155
TOTAL	54,952

Market Competition

Banking competition is heavy in the AA, with 18 Federal Deposit Insurance Corporation (FDIC)-insured depository institutions maintaining 84 offices throughout the designated AA. According to the FDIC Deposit Market Share Report, as of June 30, 2021, the bank ranked 8th in terms of deposit market share, encompassing 4.66 percent of the total AA deposit dollars totaling \$583,845M. It should also be noted that the AA includes a very high number of large, national or regional depository institutions with significant market profile in the AA, with only one locally operated community bank in competition with University Bank in the city of Ann Arbor (Bank of Ann Arbor) and only one other locally operated community bank elsewhere in Washtenaw

County (Chelsea State Bank). Other competitors with greater share in the deposit market ranged in size from \$83.3B in total deposits to \$3,190B and with total domestic offices (on a nationwide basis) from 421 to 4,916 offices.

Deposit Market Share - as of June 30, 2021				
Metropolitan Statistical Area – ANN ARBOR, MI				
Institution	State Headquartered	# of Offices in Market	Deposits (\$000s)	Market Share %
JP Morgan Chase Bank, NA	OH	9	2,444,010	19.51%
Bank of Ann Arbor	MI	6	1,731,107	13.82%
Keybank National Association	OH	8	1,525,548	12.18%
The Huntington National Bank	OH	16	1,439,117	11.49%
PNC Bank, NA	DE	9	1,176,804	9.39%
Comerica Bank	TX	9	1,000,070	7.98%
Bank of America, NA	NC	3	888,455	7.09%
University Bank	MI	1	583,845	4.66%
Old National Bank	IN	4	445,050	3.55%
Chelsea State Bank	MI	3	366,148	2.92%
Fifth Third Bank	OH	3	335,916	2.68%
Flagstar Bank	MI	5	255,978	2.04%
Northstar Bank	MI	1	111,574	0.89%
Level One Bank	MI	3	86,068	0.69%
First Merchants Bank	IN	1	62,321	0.50%
Citizens Bank, NA	RI	1	58,451	0.47%
Bank Michigan	MI	1	15,559	0.12%
Comerica Bank & Trust, NA	MI	1	509	0.00%
Number of Institutions in the Market: 18				
TOTAL		84	\$12,526,531	100%

As a further reflection on the competitiveness within the AA it is worth noting that with respect to the bank’s overall performance context, the deposit volume reported in Deposit Market Share report summarized above is inclusive of deposits originating from outside the defined AA based upon the Bank’s sub-servicing activities. These mortgage subservicing activities generate a large but variable volume of seasonally affected deposits relating to remitted payments and escrow account administration. These balances fluctuate throughout the year based on a number of factors, including the number of secondary market loans currently serviced by the Bank and the relative volume of escrow balances. With regard to the number of loans serviced, changes in market rates and other economic conditions can affect volumes of refinancing activity and the number of loans actively serviced. Escrow account balances tend to reflect fluctuation based on timing of account remittances and the seasonal patterns of loan origination activity (the corollary of when escrow accounts are opened). Certain escrow remittances, such as property tax payments, are concentrated during specific times (e.g. year-end) whereas payments for services

like hazard insurance also tend to be concentrated most heavily during high loan production/homes sales months. Based on these externalities, account balances tend to fluctuate throughout the year, resulting in a greater degree of instability in non-local funding sources in contrast to institutions with more traditional commercial banking business models. Deposits originating solely from the Bank's community banking activities are detailed below:

Community Bank Deposits (Consumer & Commercial)				
As of Date:	Demand Deposits	Savings	CD's	Total
December 31, 2018	\$20,165,757	\$442,415	\$2,323,770	\$22,931,942
December 31, 2019	\$13,341,046	\$330,732	\$1,834,468	\$15,506,246
December 31, 2020 ¹	\$20,650,269	\$432,242	\$1,561,140	\$22,643,651

Economic and Demographic Data

According to the 2015 American Community Survey (ACS) data, there are 100 census tracts within the bank's AA with the following income designations: 16 low-income, 16 moderate-income, 37 middle-income, 25 upper-income, and 6 tracts with no income designation. Low- and moderate-income tracts are mostly in and around the City of Ypsilanti, on the east side of the county, with a few moderate-income tracts near Ann Arbor. The tracts with no income designation include Willow Run Airport in Ypsilanti, and tracts in downtown Ann Arbor comprised of the University of Michigan. The following table illustrates select demographic information about the AA.

Demographic Information of the Assessment Area						
University Bank Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	100	16.0	16.0	37.0	25.0	6.0
Population by Geography	354,092	14.9	12.9	40.2	27.6	4.4
Housing Units by Geography	149,098	15.8	14.1	40.5	27.5	2.0
Owner-Occupied Units by Geography	82,525	6.6	12.0	44.7	36.5	0.2
Occupied Rental Units by Geography	55,542	28.7	17.6	34.3	15.0	4.4
Vacant Units by Geography	11,031	20.0	12.6	41.1	23.1	3.2
Businesses by Geography	28,343	9.0	9.2	42.5	32.5	6.8
Farms by Geography	925	3.5	6.2	56.5	33.4	0.4
Family Distribution by Income Level	79,373	22.7	17.0	19.6	40.7	0.0
Household Distribution by Income Level	138,067	25.4	15.9	15.8	42.9	0.0
Median Family Income MSA - 11460 Ann Arbor, MI MSA		\$87,331	Median Housing Value			\$208,543
			Median Gross Rent			\$1,001
			Families Below Poverty Level			8.0%

¹ Deposit totals for 2020 include deposits related to Warehouse Lines (all out of AA).

Source: 2015 ACS and 2020 D&B Data. Due to rounding, totals may not equal 100.0%
 (*) The NA category consists of geographies that have not been assigned an income classification.

The above table reveals that the bank’s combined AA is comprised of 16 low-income census tracts, 16 moderate-income census tracts, 37 middle-income census tracts, and 25 upper-income census tracts (with 6 tracts not rated). The largest portion of the AA population resides in middle-income census tracts, totaling 40.2% of the AA population.

Based on 2020 FFIEC data, the median family income for the Ann Arbor MSA totaled \$101,500. At the same time, the state of Michigan non-MSA median family income was \$60,900 based on the 2020 FFIEC estimated data. The following table summarizes the income ranges for low-, moderate-, middle-, or upper-income designations based on estimated FFIEC income values for the MSA for the 2018, 2019, and 2020 reporting years. It should be noted that FFIEC estimated data are subject to periodic correction based on census and ACS survey results.

Area Estimated Median Family Income Ranges					
Dataset	Low	Moderate	Middle	Upper	Median
Ann Arbor MSA - FFIEC Estimated MFI					
2018	\$ 46,449	\$ 46,450 \$ 74,319	\$ 74,320 \$ 111,479	\$ 111,480	\$ 92,900
2019	\$ 50,599	\$ 50,600 \$ 80,959	\$ 80,960 \$ 121,439	\$ 121,440	\$ 101,200
2020	\$ 50,749	\$ 50,750 \$ 81,199	\$ 81,200 \$ 121,799	\$ 121,800	\$ 101,500

Housing Demographics

Based on housing values, income levels, and rental costs, housing in the AA appears to be less affordable than in the state of Michigan at large. The median housing value for the Ann Arbor MSA AA was \$208,543 per 2015 ACS data and \$263,600 based on U.S. Census Bureau, American Community Survey (ACS) and Puerto Rico Community Survey (PRCS) 5-Year Estimates, which are significantly higher than the estimated median housing value for the State of Michigan of \$154,900 based upon 2019 5-year estimated ACS data². Similarly, the owner-occupied housing unit rate for Washtenaw County also trends lower than statewide estimates at 61.1% versus 71.2%. Median gross rents from 2019 ACS data were also significantly greater than gross rents on a statewide basis, totaling \$1,114 versus \$871. This differential (~ +28%) is likely attributable not only to the greater area median income, but also to the large concentration of student housing in the AA to support the University of Michigan and Eastern Michigan University.

Industry and Employment Demographics

The AA economy is diverse and is supported by a mixture of education, health care and social assistance, retail trade, and other service-oriented sectors. According to the U.S. Census Bureau

² See U.S. Census Bureau, American Community Survey (ACS) and Puerto Rico Community Survey (PRCS), 5-Year Estimates - <https://www.census.gov/quickfacts/fact/table/MI/SBO001212>

2018 County Business Patterns, by number of paid employees in the AA (excluding governmental employment, including the majority of the education sector), health care and social assistance was the largest source of employment (39,614), followed by accommodation and food service (18,241), retail trade (17,501), manufacturing (15,656), and professional, scientific, or technical services (14,592). Total paid employees for all sectors were reported as 155,894. According to the U.S. Department of Labor, Bureau of Labor Statistics, the average unemployment rate (not seasonally adjusted) was estimated to be 9.9% during 2020 for the state of Michigan, which was considerably greater than the projected annual rate for Washtenaw County for the same period, which was estimated to be 3.6%. Note: Both unemployment rate projections, but particularly the statewide rate, are projected to be disproportionately affected by the COVID-19 pandemic event.

Conclusions as to Performance Context and Community Needs

As supported by the independent Community Needs Interviews commissioned by the Bank and further detailed below, a review of the AA indicates that wealth inequality and access to affordable housing remains one of the greatest challenges in the AA. As indicated by the Bank's CRA Self-Assessment completed in June 2021, the AA is a competitive banking market with eighteen (18) institutions reported in the most recent FDIC Deposit Market Share report and many more participating in the AA through direct and indirect lending activity. Access to credit for commercial enterprises is determined to be generally good based on the number and portfolio composition of these peer institutions; however, access to affordable housing, particular for low-to-moderate income persons is a significant ongoing challenge. Significant variances in tract level income ratings and individual tract median incomes further reveal challenges in income and wealth inequality in the area. Recent ACS 5-year estimated data (2015-19) also indicated that gross rents were up to 28% higher than state averages within the AA. Although reinforced strongly by the results of the Community Needs Interviews, an independent analysis of the AA supports the conclusion that access to and support for affordable housing is the most impactful focus area for the Bank's CRA efforts and initiatives.

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Historic Lending Performance Analysis

Loan Distribution by Borrower's Profile

Borrowers are classified into low-, moderate-, middle-, and upper-income categories by comparing their reported income on the HMDA Loan Application Register (LAR) for University Bank and the Bank's affiliates University Lending Group (LEI: 549300DZCP6EQ7DCSD79) and UIF, LLC (LEI: 549300BXWU32AYWT1A56) to the applicable median family income figure applicable to the geography of the applicant, as detailed in the Income and Wealth Demographics section of this assessment above. All activity detailed below was originated in the Washtenaw County AA during the applicable reporting year. The following tables show the distribution of HMDA loans by borrower income level on the basis of the nominal number of loans originated (count) and dollar volume. Additional aggregate analysis and peer information is provided in the Peer Analysis and Conclusions section of this self-assessment below.

Ann Arbor MSA Assessment Area:

The following tables are provided for the Washtenaw County/ Ann Arbor MSA AA (as defined in the AA Analysis section above).

Distribution of Home Mortgage Loans by Borrower Income Level University Bank Assessment Area					
Borrower Income Level	% of Families	#	%	\$(000s)	%
Low					
2018	22.7	10	7.6	1,070	3.4
2019	22.7	26	8.2	3,303	4
2020	22.7	81	8.9	11,913	5
Moderate					
2018	17	25	19	4,805	15.4
2019	17	78	24.5	16,005	19.3
2020	17	199	21.9	39,799	16.7
Middle					
2018	19.6	38	29	8,220	26.3
2019	19.6	92	28.8	21,543	26
2020	19.6	250	27.6	65,231	27.4
Upper					
2018	40.7	56	42.8	16,930	54.1
2019	40.7	111	34.8	38,206	46.1
2020	40.7	357	39.4	116,009	48.7
Not Available					
2018	0	2	1.5	270	0.9
2019	0	12	3.8	3,734	4.5
2020	0	20	2.2	5,106	2.1

Totals					
2018	100	131	100	31,295	100
2019	100	319	100	82,791	100
2020	100	907	100	238,058	100

Source: Tables extracted from June 21, 2021 FDIC Public Performance Evaluation. Sources referenced include 2015 ACS; Bank Data, 2018-20 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Supplemented with data for 2018 performance year if unavailable in FDIC PE.

Geographic Distribution of HMDA Loans

As noted in the description of the Bank's AA above, the AA is comprised of 100 census tracts consisting of 16 low-income tracts, 16 moderate-income tracts, 37 middle-income tracts, 25 upper-income tracts, and 6 unrated tracts. The analysis in this section illustrates the distribution of the Bank's loan activity, as well as activity from its CRA affiliates, across these geographies. The following tables display the geographic distribution of HMDA loans within the AA.

Ann Arbor MSA Assessment Area:

The following tables are provided for the Washtenaw County/ Ann Arbor MSA assessment area (as defined in the Assessment Area Analysis section above)

Geographic Distribution of Home Mortgage Loans					
University Bank Assessment Area					
Tract Income Level	% of Owner-Occupied Housing Units	#	%	\$(000s)	%
Low					
2018	6.6	6	4.5	740	2.4
2019	6.6	25	7.8	4,367	5.3
2020	6.6	56	6.2	9,986	4.2
Moderate					
2018	12	21	16	3,825	12.2
2019	12	48	15	9,248	11.2
2020	12	102	11.2	19,784	8.3
Middle					
2018	44.7	58	44.3	13,250	42.3
2019	44.7	134	42	33,474	40.4
2020	44.7	373	41.1	91,277	38.3
Upper					
2018	36.5	44	33.6	12,830	41
2019	36.5	112	35.1	35,702	43.1
2020	36.5	374	41.2	116,323	48.9
Not Available					
2018	0.2	2	1.5	650	2
2019	0.2	0	0	0	0
2020	0.2	2	0.2	688	0.3

Totals					
2018	100	131	100	31,295	100
2019	100	319	100	82,791	100
2020	100	907	100	238,058	100

Source: Tables extracted from June 21, 2021 FDIC Public Performance Evaluation. Sources referenced include 2015 ACS; Bank Data, HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%. Supplemented with data for 2018 performance year if unavailable in FDIC PE.

Geographic and Gross Annual Revenue Distribution of Small Business Loans

As noted in the description of the Bank's AA above, the AA is comprised of 100 census tracts consisting of 16 low-income tracts, 16 moderate-income tracts, 37 middle-income tracts, 25 upper-income tracts, and 6 unrated tracts. The following tables display the geographic distribution of small business loans within the AA.

Geographic Distribution of Small Business Loans					
University Bank Assessment Area					
Tract Income Level	% of Businesses	#	%	\$(000s)	%
Low					
2018	--	3	30.0	1,150	43.6
2019	8.9	0	0.0	0	0.0
2020	9.0	4	4.7	161	2.1
Moderate					
2018	--	0	0.0	0	0.0
2019	9.2	0	0.0	0	0.0
2020	9.2	5	5.9	372	5.0
Middle					
2018	--	4	40.0	750	28.4
2019	42.7	4	40.0	1,116	50.6
2020	42.5	37	43.5	1,992	26.5
Upper					
2018	--	2	20.0	684	25.9
2019	32.0	6	60.0	1,088	49.4
2020	32.5	36	42.4	4,584	61.0
Not Available					
2018	--	1	10.0	53	2.0
2019	7.2	0	0.0	0	0.0
2020	6.8	3	3.5	406	5.4

Totals						
	2018	100.0	10	100.0	2,637	100.0
	2019	100.0	10	100.0	2,204	100.0
	2020	100.0	85	100.0	7,515	100.0

Source: Tables extracted from June 21, 2021 FDIC Public Performance Evaluation. Sources referenced include 2019 & 2020 D&B Data; Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%

The following table describes lending to small businesses based on the income category of the business.

Distribution of Small Business Loans by Gross Annual Revenue Category						
University Bank Assessment Area						
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%	
<=\$1,000,000						
2018	--	10	100.0	2,637	100.0	
2019	83.3	10	100.0	2,204	100.0	
2020	85.2	9	10.6	2,089	27.8	
>\$1,000,000						
2018	--	0	0.0	0	0.0	
2019	5.9	0	0.0	0	0.0	
2020	5.2	1	1.2	250	3.3	
Revenue Not Available						
2018	--	0	0.0	0	0.0	
2019	10.8	0	0.0	0	0.0	
2020	9.6	75	88.2	5,176	68.9	
Totals						
	2018	100.0	10	100.0	2,637	100.0
	2019	100.0	10	100.0	2,204	100.0
	2020	100.0	85	100.0	7,515	100.0

Source: Tables extracted from June 21, 2021 FDIC Public Performance Evaluation. Sources referenced include 2019 & 2020 D&B Data; Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%

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Historic Community Development Analysis

With regard to the historic performance context information presented below, it should be noted that University Bank was classified as a ‘small bank’ for purposes of examinations of compliance under the CRA through the 2019 reporting year and first became an ‘intermediate small bank’ for the 2020 reporting year. The change to ‘intermediate small bank’ status introduced new requirements in relation to the former ‘small bank’ examination methodology with regard to assessment of community development performance in the defined assessment area.

Community Development Lending

University Bank originated or renewed a total of 17 community development loans within its AA totaling \$2,288,050 in dollar volume between January 1, 2018 and December 31, 2020. The number and dollar volume of these loans is summarized in the table below:

Community Development Loans - Inside AA: 2018 – 2020 (000s)				
Dataset	2018	2019	2020	Total
Community Development Loans	1	2	8	11
	\$50	\$722	\$531	\$1,303

Below are notable narratives of the Bank’s community development lending activities within these performance years:

- Four loans totaling \$656,200 were made to a child-care organization that prepares children from low and moderate-income households for future academic success and provides their parents with opportunities for professional, personal, and economic growth.
- A \$571,500 loan was originated for the purchase of a hardware store in Ypsilanti that is located in an economically distressed area targeted for re-development. The business offered, among other things, essential products including personal protective equipment during the height of the pandemic, for the low- and moderate-income communities that surround it. It also provides job opportunities within those same communities.

Community Development Investments & Donations

University Bank reported no securities in qualifying community development investments for the 2018 - 2020 performance years. In addition, the Bank reported 8 qualifying donations totaling \$48,857 for the 2018 through 2020 reporting years. The following table summarizes this information:

Community Development Donations & Investments	
Dataset	2018 - 2020
Donations	8 donations 48,857 dollars

Dataset	2018 - 2020	
Investments	0	securities
	0	dollars

Donation activity includes multiple investments in the Habitat for Humanity of Huron Valley, a non-profit organization focused on improving accessibility to affordable housing for low-income persons located in Washtenaw County, Michigan. The FDIC’s Public Performance Evaluation of the Bank did recognize two affordable housing investments totaling \$3,1250,000 made during 2021 in the most recent CRA examination, but as noted in the table above, no community development investments were made between 2018 and 2020.

Community Development Service Hours

University Bank recorded 166 community development service hours between 16 functions during the 2018 through 2020 performance years.

Community Development Services					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
2018	0	8	2	0	10
2019	0	2	2	0	4
2020	0	1	1	0	2
Total	0	11	5	0	16

Below are four notable narratives of the Bank’s service hour activities for the 2018 through 2020 performance period:

- During each year above, a bank employee served on the Board of a local economic development corporation. He previously served as the President of the corporation bringing years of banking expertise and financial knowledge.
- A bank employee provides marketing support services to an affordable housing organization serving low- and moderate-income individuals.
- During each year above, a bank employee served on the Board and the Loan Committee for a nonprofit SBA microloan lender. He also served as interim Treasurer for some months in 2018.
- On several occasions during the period above, bank employees provided financial literacy education to low- and moderate-income individuals through three different organizations. The organizations primarily serve foster care youth transitioning to adulthood, a homeless shelter, and a youth homeless shelter.

Community Needs Interviews

In the course of development of this CRA Strategic Plan, University Bank engaged independent consultant Kim Kuhle of Omaha, Nebraska to perform a series of verbal interviews of community contacts with business and community leaders in the Washtenaw County AA during August 2020.

Overview and Methodology

Contacts were selected based on input from bank staff and a review of active associations and not-for-profit entities operating in the AA and focused on meeting community needs considered in the community development context of the CRA. Each identified community contact was interviewed by the independent consultant to assist in identifying outstanding needs within the AA that may be addressed via this Strategic Plan. Results from these interviews were included in a summary notation to University Bank and a brief summary of each contact and the results of this process are detailed below.

Community Contacts

Ann Arbor SPARK – Phil Santer

Ann Arbor SPARK is an economic development organization for the Ann Arbor area with a focus on helping companies grow, connecting job seekers to new opportunities, and supporting millions in investments in local businesses.

Economic Development Commission of the City of Ann Arbor – Peter Long

The Economic Development Corporation of the City of Ann Arbor was formed under Michigan's Economic Development Corporation Act in 1978. Its purpose is to assist in the attraction, relocation, retention and expansion of profit and non-profit organizations which provide employment and which are considered desirable and beneficial to the City. It has carried this out primarily by its issuance of tax-exempt revenue bonds. This has permitted borrowers to realize substantial savings in financing costs due to the difference between taxable and tax-exempt interest rates.

Michigan Small Business Development Center – Charlie Penner

The 'SBDC' provides business planning and technical support services to emerging businesses in the Ann Arbor region.

Shelter Association of Washtenaw County – Daniel Kelly, Alisha Lon

The Shelter Association of Washtenaw County provides temporary shelter and connections to services in a safe and caring environment and works with the community to allocate the necessary resources to meet the needs of people who are experiencing homelessness. The Association serves nearly 1,200 adults experiencing homelessness each year.

Ann Arbor Housing Commission – Jennifer Hall

Ann Arbor Housing Commission seeks to provide desirable housing and related supportive services for low-income individuals and families on a transitional and/or permanent basis. AAHC partners with housing and service providers to build healthy residential communities and promote an atmosphere of pride and responsibility.

United Way of Washtenaw County – Pamela Smith, Ugbaad Kenyan

The United Way provides funding for nonprofits that, in turn, provide basic social services to low-and moderate-income people.

Summary of Interview Results

The independent verbal interviews performed by Ms. Kuhle during August 2020 identified access to affordable housing as the greatest extant need within the Washtenaw County AA. Strong economic performance in the AA in recent years and high levels of existing development have resulted in significantly increasing home prices; a trend which has been further exacerbated by inflation in home prices and associated housing inputs such as materials costs. Stocks of affordable housing are limited in the AA and new development and rehabilitation activity has been outpaced by demand for affordable housing supply. A secondary need identified via the interview process was access to financial education and financial literacy programs. Respondents indicated that within low-to-moderate income communities, financial literacy remains low, and many persons are unaware of the programs available from financial institutions and other entities, indicating that opportunities for expanding outreach programs in the AA exist.

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Plan Overview and Methodology

This CRA Strategic Plan has been established in accordance with the following rationale and methodology:

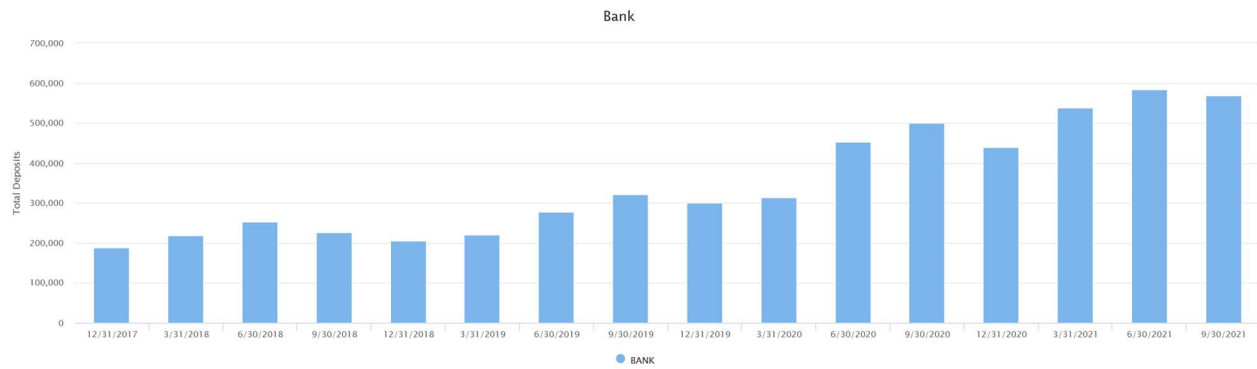
Overview and Rationale

Based on the unique business model of University Bank and its affiliated entities detailed above, the Bank derives a substantial majority of deposits from outside the local AA via the mortgage servicing activities undertaken directly by the Bank or indirectly via affiliated entities. This business model presents unique challenges with respect to CRA performance as these deposits are not derived from the consumers, businesses, and other entities living or operating in the Ann Arbor AA, but rather are received from consumers throughout the nation in connection with mortgage servicing activities such as payment processing and remittance and escrow account administration. As these deposits are not locally derived through normal business operations, an imbalance is created between the Bank's traditional community banking business activities and those activities corresponding to these nationwide services, which comprise a substantial majority of the Bank's business operations and contribute to an elevated asset size that is not reflective of the Bank's community banking operations. In contrast to traditional commercial banks of comparable asset size, University Bank maintains a smaller branch footprint, has fewer commercial or retail lending staff, and generally supports a smaller operational footprint within the AA, which diminishes the capacity of the Bank to generate comparable levels of activity in the AA based on this more limited presence and local business activity.

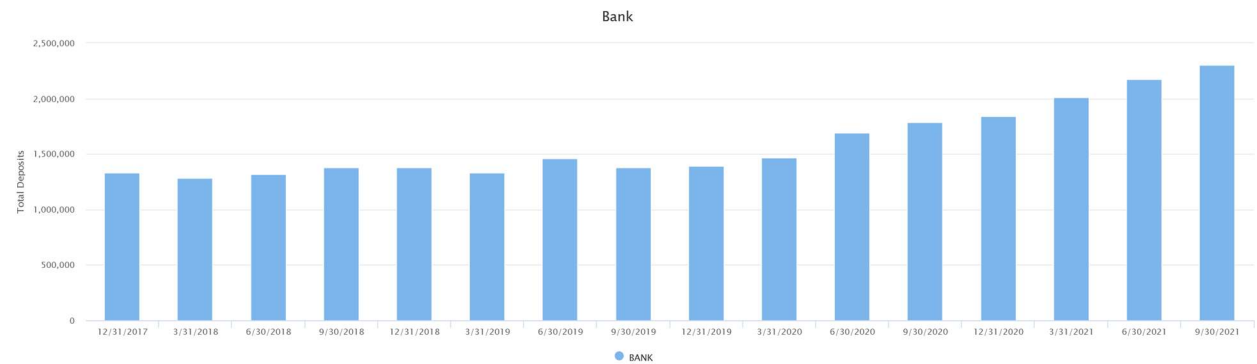
Another significant consideration pertains to the nature of the Bank's deposit sources. Mortgage subservicing activity is highly cyclical with respect to continuous inflows and outflows of cash deposits. Large transactional inflows derived from refinancing or home sales events occur unevenly throughout the year, as do new home purchase transactions and corresponding increases in servicing activities. Other events, such as payments of property taxes for administered escrow accounts, also tend to be disproportionately concentrated in specific months of a given year. Coupled with the cycle of remittances of received payments or mortgage payoffs to the underlying investors that own mortgage-backed securities, the Bank routinely experiences significant variations in cash deposits throughout a given year, creating a fluctuating deposit base that cannot be utilized in the same proportion for direct lending activities in contrast to deposit sources that traditionally comprise the majority of deposit portfolios among the Bank's AA peers. In addition, monthly deposit flows are significant, with month-end cash deposits significantly higher than the monthly average.

To illustrate this cyclicity, charts extracted from FFIEC Uniform Bank Performance Reports were extracted for University Bank and the Bank of Ann Arbor, which is a more conventional commercial bank operating in the Ann Arbor, MI AA. As indicated in the charts below, University Bank experienced a greater level of volatility in changes in deposit volumes in contrast to a more traditional area competitor based on the business model factors discussed above.

University Bank



Bank of Ann Arbor:



Based on these considerations, this Strategic Plan will formulate goals based upon perceived community needs, historic bank performance, and peer performance. In order to formulate objective performance goals, we have determined that the most reasonable metric available to establish annual goals will utilize an analysis of historical, peer, and/or aggregate performance within the AA of the Bank for the prior performance year. Where practicable, metrics such as a percentage of loan volume targeted to low-to-moderate income persons or other comparable metrics will be used in preference to a static plan goal; however, static goals may be utilized where aggregate or peer performance is unavailable or inconclusive. Individual goals will generally be established based upon several factors, including: (1) historic performance of the Bank, (2) peer performance, (3) apparent community needs, (4) projected capacity of the Bank to meet the performance goal based on current business activities and market conditions.

Methodology

For each Plan Year, the Bank will be assessed in its AA based on six measurable goals: (1) Lending to Low-to-moderate (LMI) Borrowers for HMDA-reportable transactions, (2) Lending in LMI Geographies for HMDA-reportable transactions, (3) Lending meeting the 'community development' definition, (4) Investments meeting the 'community development' definition, (5) Donations or grants meeting the 'community development' definition, and (6) Services / Service Hours meeting the 'community development' definition. These measurable goals will be combined in the methods detailed below to ultimately determine the Bank's CRA Exam rating.

Performance for University Bank as well as any eligible affiliated entities will be considered when evaluating performance in the defined AA, which is comprised of the entirety of the Ann Arbor, Michigan Metropolitan Statistical Area, which is also presently equivalent to the entirety of Washtenaw County, Michigan.

Measurable Goals

With respect to each plan goal detailed below, performance targets will be established at the beginning of each Plan Year using data from the end of the previous year as a performance guide, as applicable. Plan goals will be displayed for the baseline ‘Satisfactory’ rating as well as the ‘Outstanding’ rating, although individual ratings for plan goals will be dependent on the relative percentage to which that goal was achieved (e.g. achieving 110% of the baseline goal will result in a ‘High Satisfactory’ rating as further detailed below).

Goal Attainment

When assessing attainment of performance goals, goals will be deemed to be satisfied in the event the targeted percentage of average assets or other quantitative goal is met or exceeded. As noted above, performance goals will include activity from Bank affiliates occurring within the defined AA. The Bank’s CRA Lending, CD Investment and CD Services Performance Goals will be measured using a points system. The following chart lays out the scoring system for the CRA performance activity. It assigns points based on the percentage of Plan Goal achieved multiplied by the tier point multipliers. Tier levels are utilized in the plan to provide a mechanism to ‘weight’ different plan goals based upon the importance of the goal relative to community needs and the degree to which the goal complements the Bank’s business model, enhancing the capacity of the Bank to demonstrate strong performance in that area.

Plan Goals: Points Matrix		
Ratings	Base Value	Definition
Outstanding	12	120% of PG*
High Satisfactory	9	110% of PG
Satisfactory	6	100% of PG ³
Low Satisfactory	4	90% of PG
Needs to Improve	2	80% of PG
Substantial Noncompliance	0	< 80% of PG

*PG = Plan Goal

As discussed above, the base points assigned for each rating is multiplied by the tier ranking assigned to each plan goal. For example, a ‘Tier 1’ plan goal will have a point range of 0 – 18 points based on the 1.5x multiplier applied to that goal.

³ 100% of the Plan Goal represents the baseline scenario for performance. Actual performance falling under this baseline will receive a lesser rating, while performance sufficiently in excess of this threshold will receive a higher rating.

Goal Level: Point Multipliers	
Tier 1	1.5x
Tier 2	1.0x
Tier 3	0.5x

The following table summarizes the total points from all defined plan goals needed to achieve a given rating. Total points represent the aggregate total from all plan goals calculated using the methodology discussed above, which is inclusive of goal Tier Levels and associated multipliers. As noted in this table, the ‘Satisfactory’ rating is subdivided into several sub-categories to provide greater delineation of the Bank’s performance and to better align with existing regulatory methodologies for grading CRA performance.

Overall Rating - Required Goal Scores	
Ratings	Total Pts to Earn
Outstanding	60+
Satisfactory	36 - 59
Needs to Improve	18 - 35
Substantial Noncompliance	< 18

See *Appendix A* for illustrative examples as to the performance of this rating system under various performance scenarios.

Peer Selection

As discussed in the Assessment Area Analysis & Performance Context of this Plan, University Bank has a very limited number of similarly situated institutions in the AA. University Bank’s business model as a multi-state secondary market originator and the comparatively diminished size and complexity of local community bank operations within the market result in a scenario where we have been able to identify no highly comparable peers within the AA; however, we have endeavored to identify a limited number of peer institutions that have an established branch presence in the AA, are locally-controlled, and engage in business activities in competition with University Bank within the AA.

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Peer Institution Survey				
Institution	Total Assets (12/31/2020)	Main Office	Last CRA Exam Type	Last Exam Date
University Bank	552,164	Ann Arbor, MI	ISB	6/21/2021
<i>Intermediate Small Bank PE Institutions</i>				
Northstar Bank	802,017	Bad Axe, MI	ISB	8/5/2019
<i>Other Regional Institutions Evaluated</i>				
Bank of Ann Arbor	2,212,232	Ann Arbor, MI	LB	2/28/2018
Chelsea State Bank*	379,045	Chelsea, MI	SB	11/12/2018
Level One Bank	2,440,929	Farmington Hills, MI	LB	5/26/2020
Flagstar Bank FSB	31,013,209	Troy, MI	LB	10/16/2017

* Chelsea State Bank presently exceeds the ISB threshold, but was last examined as a small bank. In addition, based on a search of the CFPB's HMDA data products and that bank's last public PE, it appears the bank was not a HMDA reporter during the analysis period. This institution may be significant for purposes of future performance analyses, but under present circumstances it does not contribute significant value for peer analysis.

As indicated in the table above, the only peer in a comparable total asset size range with the Bank was Northstar Bank. Although that bank has additional branch locations outside of the AA, Northstar Bank also maintains a single branch location in the AA (this location services approximately 5x the deposit base of University Bank within the AA). As indicated by the table below, Northstar Bank is not a best fit peer with respect to that bank's mortgage origination activities; however, it was retained as a peer institution based on asset size and presence within the market. Other institutions surveyed were considerably larger than the Bank and had a greater established local market presence with regard to locally held deposits and branch infrastructure, but generated comparable levels of mortgage production activity, such as Bank of Ann Arbor, Level One Bank, and Flagstar Bank FSB. As noted above, in the case of Chelsea State Bank, this institution was a small bank in their last CRA examination and did not appear to be a HMDA reporter during the period under consideration for this Plan; therefore, that institution is of limited utility as a peer for purposes of the current proposed plan term.

The table below summarizes the HMDA lending activity of each peer in the selected AA:

Originated HMDA Loan Activity in AA		
Lender	Year	Loans Originated
University Bank (bank-only)	2018	\$1,355,000
	2019	\$5,805,000
	2020	\$3,040,000
Subtotal		\$10,200,000
UIF (bank subsidiary)	2018	\$1,170,000
	2019	\$665,000
	2020	\$790,000
Subtotal		\$2,625,000
ULG (bank subsidiary)	2018	\$28,770,000
	2019	\$78,610,000
	2020	\$236,735,000
Subtotal		\$344,115,000

University Bank + Subsidiaries Total		\$356,940,000
Bank of Ann Arbor	2018	\$45,220,000
	2019	\$54,470,000
	2020	\$151,185,000
Bank of Ann Arbor Total		\$250,875,000
Level One Bank	2018	\$24,190,000
	2019	\$73,015,000
	2020	\$168,455,000
Level One Bank Total		\$265,660,000
Flagstar Bank FSB	2018	\$44,420,000
	2019	\$52,360,000
	2020	\$78,610,000
Flagstar Bank FSB Total		\$175,390,000
Northstar Bank	2018	\$1,460,000
	2019	\$5,200,000
	2020	\$9,310,000
Northstar Bank Total		\$15,970,000
Grand Total		\$1,064,835,000

Other institutions surveyed during analysis of HMDA lending activity for the analysis period that had comparable mortgage origination volume were not apparently suitable peers based on factors such as the size of the institution (e.g. large national or international banks), the type of institution (e.g. non-bank mortgage originator), or the lack of any branch presence in the AA (e.g. institutions only operating loan production offices in the AA).

Plan Changes and Contingencies

The Strategic Plan will operate based on an initial three-year plan term. This term may in future be amended based on the strategic needs of the Bank. As discussed above, plan performance goals are to be established and take effect at the beginning of each new plan term based on conditions immediately preceding the commencement of the new plan term. Performance goals will be based upon static dollar volume or other quantitative targets for each given term suitable to the character of the plan goal (e.g. employee count for service hour goals).

Due to the nature of the Bank's mortgage-focused business model, prevailing macroeconomic conditions, including the interest rate policy pursued by the Federal Reserve Bank, have a significant impact upon the transaction volumes of the Bank's secondary market mortgage origination and subservicing subsidiaries. As experienced during and in the aftermath of the 2008 Financial Crisis and the 2020 Pandemic, economic crises or other comparable disruptions can result in material changes in market conditions that may preclude the achievement of the plan goals established and believed to be reasonably achievable at the onset of a given plan term. In the event that market conditions substantially impact the capacity of the Bank to achieve stated goals, the Bank will proactively work with the Federal Deposit Insurance Corporation to amend the Plan as needed in order to ensure that goals are reasonably achievable based on current conditions.

Alternative Evaluation

If University Bank fails to meet the strategic plan goals outlined below for a “Satisfactory” rating, the Bank elects to be evaluated under the examination methodology that would otherwise be in effect based upon the Bank’s asset size and the current CRA examination procedures (e.g. Intermediate Small Bank methodology).

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Plan Performance Goals

The following performance goals have been defined based on the performance context, AA profile, historic performance of the Bank, and outstanding credit needs of the community in the defined AA.

Performance Goal 1: HMDA Lending to LMI Borrowers

Goal Summary: The Bank expects to achieve its measurable LMI lending goals through the origination and/or purchase of HMDA loans originated in the Ann Arbor, MI MSA AA. This goal will be based on a targeted percentage of total HMDA loans originated within the AA going to low- or moderate-income individuals based on borrower income levels.

Goal Targets: Based on our projected asset size and financial situation, we have established the following measurable lending goals. The goals have been stated as a percentage of our total originated HMDA loans in terms of lending goal to low-to-moderate income borrowers. We have chosen to tie our goal to a percentage of total HMDA loans in order to establish a concrete and measurable threshold for performance that can be supported via peer and aggregate analysis. The Bank’s measurable goals are set at a level that should be sustainable, depending on the relevant economic conditions at that time.

Plan Goal 1: LMI HMDA Loans as a percentage (%) of Total HMDA Loans* in AA (only low- to moderate-income borrowers) by Dollar Volume			
Plan Year	Satisfactory	Outstanding	Tier
2022	18.5%	22.2%	1
2023	18.5%	22.2%	1
2024	18.5%	22.2%	1

* Subject to an overall volume floor further detailed below. Actual performance targets will be the greater of the percentage of volume detailed above OR the plan floor target.

Goal Rationale:

As indicated by the income and wealth demographics of the AA and from the results of the independent Community Needs Interviews commissioned by the Bank, access to and support for affordable housing is the greatest extant need within the AA among all income demographics, but with particular reference to low-to-moderate income households.

In establishing the plan goals above, performance targets have been designated based on historic performance, extant community needs, future strategic plans, and projections regarding potential future performance based on current and emerging economic conditions. As summarized in the table below, the historic performance of the Bank has substantially increased in this area during 2020 in contrast to prior period performance. This increase is attributable to a number of factors, including but not limited to changes in national macroeconomic conditions and responses to the

return of an exceptionally low interest rate market, which has increased volumes of refinancing activity and improved purchasing power for residential dwellings for qualified applicants on at least a short-term basis. In particular, concerns regarding the sustainability of 2020 loan production levels in light of the substantial increases experienced in home prices in the AA, which ultimately diminish the affordability of homes for new buyers and the prospect of future rate increases given inflationary concerns, have induced the Bank to set targets that are believed to be achievable and provide excellent reinvestment rates of local deposits into the community. As discussed above, affordable housing has been identified as the most significant community need in the AA; therefore, we believe this plan goal will provide greatest benefit to all persons, including low-to-moderate income persons, in Washtenaw County. The following tables summarizes historic performance for this plan goal for the Bank and selected peers and combined aggregate data:

Historic Lending Volume in AA 2018 - 2020	
Year	Total
2018	\$31,295,000
2019	\$85,080,000
2020	\$240,565,000
Total:	\$356,940,000
Average:	\$118,980,000

Source: County-level HMDA data from the CFPB Data Browser (<https://ffiec.cfpb.gov/data-browser>) for Washtenaw County, Michigan.

Selected Peer Group & Aggregate Performance Lending to LMI Borrowers % of Total Loans by Dollar Volume 2018 – 2020 Averages			
Institution	Low Income	Moderate Income	Total
University Bank	4.86%	17.05%	21.90%
Selected Peers			
Bank of Ann Arbor	2.54%	10.89%	13.43%
Level One Bank	3.48%	11.75%	15.22%
Flagstar Bank	6.27%	12.99%	19.25%
Northstar Bank	0.53%	1.47%	2.00%
Peer Average⁴	3.77%	11.52%	15.29%
Aggregate Performance	4.58%	13.95%	18.53%

Source: County-level HMDA data from the CFPB Data Browser (<https://ffiec.cfpb.gov/data-browser>) for Washtenaw County, Michigan.

⁴ Adjusted for relative dollar volume. This calculation is calculated for the total number of low- or moderate-income loans originated by the peer group relative to the total loans originated by peers. It is not a simple average of the individual peer LMI performance figures.

Based on this historic performance data, the Plan Goals identified above appear to be reasonable in relation to aggregate and peer performance. Selected peer institutions generally performed worse than aggregate performance and the historic performance of University Bank even though they possessed a greater footprint within the AA in relation to branch presence, deposit market share, and similar factors.

In addition, the Bank will seek to originate a minimum dollar volume of loans within the AA based on historic performance. As discussed above, a combination of strategic growth and highly favorable market conditions have resulted in strong growth rates for the Bank within the AA in terms of HMDA-reportable loan production. Given concerns regarding the sustainability of this volume over the proposed plan term, the Bank may not be able to maintain this volume of lending in nominal terms each year. In order to establish minimum performance standards, the Bank will seek to originate a volume of loans in the AA equal to the average dollar volume of loans produced during this historic period (\$118,980,000) multiplied by the percentage of the dollar volume of loans necessary to achieve the baseline satisfactory rating (18.5%), resulting in a minimum production floor of HMDA loans to LMI borrowers of **\$22,011,300**. In the event that loan production in the assessment area exceeds this historic average, then the targeted dollar volume of lending necessary to achieve a satisfactory rating will be greater than this floor value. In the event that total origination volume falls below the historic average, then production of at least \$22,011,300 in dollar volume of HMDA lending to LMI borrowers in the assessment area will result in satisfactory performance for this plan goal.

In the context of this Plan, we have elected to establish plan goals based on achieving a targeted percentage of overall lending to LMI borrowers in order to accommodate changing economic conditions. High levels of potentially sustained inflation, record levels of federal debt and spending, and significant demand and supply issues in the economy create high levels of uncertainty as to future economic performance that make estimates as to growth or contraction equally difficult in nature. In addition, the Bank anticipates no significant changes in its business model in the AA during the performance period that would significantly affect the structure, portfolio composition, branch network, or personnel of the Bank.

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Performance Goal 2: HMDA Lending in LMI Geographies

Goal Summary: The Bank expects to achieve measurable lending goals through the origination and/or purchase of HMDA loans originated in the Ann Arbor, MI MSA AA. This goal will be based on a targeted percentage of total HMDA loans going to low- or moderate-income geographies based on the income rating of each tract in the AA.

Goal Targets: For the 2022, 2023, and 2024 plan years, the Bank will seek to originate the following volumes of HMDA-reportable mortgage loans in the defined AA. The goals have been stated as a percentage of our total originated HMDA loans in terms of lending goal within low-to-moderate income census tracts. We have chosen to tie our goal to a percentage of total HMDA loans in order to establish a concrete and measurable threshold for performance that can be supported via peer and aggregate analysis. The Bank's measurable goals are set at a level that should be sustainable, depending on the relevant economic conditions at that time.

Plan Goal 2: LMI HMDA Loans as a percentage (%) of Total HMDA Loans* in AA (only low- to moderate-income tracts) by Dollar Volume			
Plan Year	Satisfactory	Outstanding	Tier
2022	13.9%	16.6%	1
2023	13.9%	16.6%	1
2024	13.9%	16.6%	1

* Subject to an overall volume floor further detailed below. Actual performance targets will be the greater of the percentage of volume detailed above OR the plan floor target.

Goal Rationale:

Performance Goal 2 builds upon performance Goal 1 to ensure that not only does the Bank extend a reasonable amount of credit to support access to affordable housing to LMI borrowers in the Ann Arbor AA, but also to support the goal of supporting geographies (i.e. census tracts) in Washtenaw County that are assigned a low-to-moderate income rating based on census and FFIEC data in order to ensure that persons in historically disadvantaged or less affluent areas of the community have meaningful access to fair and equitable credit products.

Similar to the rationale for Goal 1, we analyzed historic performance of the Bank and the distribution of loans within the AA between 2018 and 2020. As discussed in Goal 1 above, the Bank experienced exceptionally high volumes of transaction activity in 2020, which may be in part be attributable to the exceptionally low interest rate environment fostered by the Federal Reserve's permissive interest rate policy. Inflationary concerns and significant market price increases within a wide range of different dwelling types may significantly affect future performance activity in the AA. As identified in the Community Needs Interviews discussed above, affordable housing has been identified as the most significant community need in the AA; therefore, we believe this plan goal will provide greatest benefit to all persons, including persons

located in low to moderate income geographies in the AA. The following table summarizes historic performance for this goal:

Historic Lending Volume in AA 2018 - 2020	
Year	Total
2018	\$31,295,000
2019	\$85,080,000
2020	\$240,565,000
Total:	\$356,940,000
Average:	\$118,980,000

Source: County-level HMDA data from the CFPB Data Browser (<https://ffiec.cfpb.gov/data-browser>) for Washtenaw County, Michigan.

Selected Peer Group & Aggregate Performance Lending to LMI Tracts % of Total Loans by Dollar Volume 2018 – 2020 Averages			
Institution	Low Income	Moderate Income	Total
University Bank	4.25%	9.31%	13.56%
Selected Peers			
Bank of Ann Arbor	7.36%	11.54%	18.90%
Level One Bank	3.75%	5.79%	9.54%
Flagstar Bank	3.97%	8.39%	12.36%
Northstar Bank	42.64%	0.47%	43.11%
Peer Average⁵	5.96%	8.35%	14.31%
Aggregate Performance	4.68%	8.96%	13.64%

Source: County-level HMDA data from the CFPB Data Browser (<https://ffiec.cfpb.gov/data-browser>) for Washtenaw County, Michigan.

Based on this historic performance data, the Plan Goals identified above appear to be reasonable in relation to aggregate and peer performance. Selected peer institutions generally slightly better than aggregate performance and the historic performance of the Bank; however, the Bank was generally well-aligned with both aggregate and peer performance over this analysis period.

In addition, the Bank will seek to originate a minimum dollar volume of loans within the AA based on historic performance. As discussed above, a combination of strategic growth and highly favorable market conditions have resulted in strong growth rates for the Bank within the AA in terms of HMDA-reportable loan production. Given concerns regarding the sustainability of this volume over the proposed plan term, the Bank may not be able to maintain this volume of

⁵ Adjusted for relative dollar volume. This calculation is calculated for the total number of low- or moderate-income loans originated by the peer group relative to the total loans originated by peers. It is not a simple average of the individual peer LMI performance figures.

lending in nominal terms each year. In order to establish minimum performance standards, the Bank will seek to originate a volume of loans in the AA equal to the average dollar volume of loans produced during this historic period (\$118,980,000) multiplied by the percentage of the dollar volume of loans necessary to achieve the baseline satisfactory rating (13.9%), resulting in a minimum production floor of HMDA loans in LMI tracts of **\$16,538,220**. In the event that loan production in the assessment area exceeds this historic average, then the targeted dollar volume of lending necessary to achieve a satisfactory rating will be greater than this floor value. In the event that total origination volume falls below the historic average, then production of at least \$16,538,220 in dollar volume of HMDA lending to LMI tracts in the assessment area will result in satisfactory performance for this plan goal.

In the context of this Plan, we have elected to establish plan goals based on achieving a targeted percentage of overall lending in LMI tracts in order to accommodate changing economic conditions. High levels of potentially sustained inflation, record levels of federal debt and spending, and significant demand and supply issues in the economy create high levels of uncertainty as to future economic performance that make estimates as to growth or contraction equally difficult in nature. In addition, the Bank anticipates no significant changes in its business model in the AA during the performance period that would significantly affect the structure, portfolio composition, branch network, or personnel of the Bank.

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Performance Goal 3: Community Development Loans

Goal Summary: Achieve a designated dollar volume of loans meeting the CRA’s community development definition originated in the Ann Arbor, Michigan MSA AA.

Goal Targets: For the 2022, 2023, and 2024 plan years, the Bank will seek to originate a designated dollar volume of loans expressed as a percentage of average total assets in the defined AA of Ann Arbor, Michigan MSA. Additional lending on a regional or statewide basis, as otherwise allowed by Part 345 or the FFIEC CRA FAQs, may be included in this performance goal if community development lending activity inside the AA is sufficient to achieve a ‘satisfactory’ rating.

Plan Goal 3: Community Development Lending (as % of Avg. Total Assets)*			
Plan Year	Satisfactory	Outstanding	Tier
2022	0.30%	0.36%	2
2023	0.30%	0.36%	2
2024	0.30%	0.36%	2

* Plan goals are presented based on Average Total Assets (as defined in the Glossary) as of December 31 of the calendar year immediately preceding the Plan Year identified in this table.

Goal Rationale:

University Bank is committed to ensuring that the Bank maintains a strong level of lending in qualifying community development activities in the defined AA. In furtherance of this commitment, the plan goals above have been established based on the capacity of the Bank as demonstrated by historic performance in recent years and analysis of area peer performance.

Goal targets are in alignment with historic community development lending performance of the Bank and selected peer institutions, as indicated by the summary table below and are believed to be a strong commitment to continued community development activities in the AA.

Peer Comparison: Community Development Loans in AA			
Institution	Performance Period	Total # of Loans	Total \$ Vol. of Loans
University Bank	2018 – 2021 (ytd)	17 loans	\$1,635,000
Bank of Ann Arbor	2014 - 2018	30 loans	\$8,210,000
Level One Bank*	2017 - 2020	No loans	\$0
Flagstar Bank FSB	2014 - 2016	1 loan	\$8,300,000
Northstar Bank*	2015 - 2019	No loans	\$0

* Level One Bank and Northstar Bank had no reportable CD loans during the analysis period in the Ann Arbor MSA. It should be noted that branches in the AA were acquired by Level One Bank recently, which diminished recent performance in the AA and reduced the value of this peer for comparative purposes in analysis of this performance goal.

As indicated in the table above, peer data for community development lending activity is limited in availability for the selected peer institutions. Two peer institutions reported no community development lending activity during the most recent public performance evaluation available. One peer, Level One Bank, is a large institution that was assessed on the basis of performance in multiple assessment areas and that originated no community development loans in the AA. Another peer, Northstar Bank, is an intermediate small bank that was also assessed on the basis of performance in multiple assessment areas, with the Ann Arbor MSA designated as a ‘limited analysis’ assessment area.

For the remaining two selected peers (both large banks), each peer originated between \$2.5MM and \$2.7MM in community development loans on an annualized basis after adjusting for the exact period of time considered in each respective performance evaluation (3.2 years for Bank of Ann Arbor and 3 years for Flagstar Bank FSB). Both peers are considerably larger than University Bank on the basis of total assets, branch presence in the AA, and local deposits originating in the AA. Given the comparatively limited presence of the Bank’s branch structure and asset size relative to these institutions, we believe an annualized lending goal less than these peers, but greater than the historic community development lending activity of the Bank to be a reasonable target with respect to this performance goal. For example, based on average total assets as of the September 30, 2021 Call Report, the 0.30% ‘Satisfactory’ performance goal would equate to an annual community development lending volume of \$1,952,019, which appears to be well aligned to peer performance.

In the context of this Plan, we have elected to establish plan goals defined as a percentage of average total assets in order to accommodate potential adjustment in the Bank’s balance sheet from changing economic conditions. High levels of potentially sustained inflation, record levels of federal debt and spending, and significant demand and supply issues in the economy create high levels of uncertainty as to future economic performance that make estimates as to growth or contraction equally difficult in nature. In addition, the Bank anticipates no significant changes in its business model in the AA during the performance period that would significantly affect the structure, portfolio composition, branch network, or personnel of the Bank.

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Performance Goal 4: Community Development Investments

Goal Summary: Achieve a designated dollar volume of annual and cumulative investments meeting the CRA’s community development definition in the Ann Arbor, Michigan MSA AA.

Goal Targets: For the 2022, 2023, and 2024 plan years, the Bank will seek to acquire a designated dollar volume of investments expressed as a percentage of average total assets in the defined AA of Ann Arbor, Michigan MSA. Additional investments on a regional or statewide basis, as otherwise allowed by Part 345 or the FFIEC CRA FAQs, may be included in this performance goal if community development investment activity inside the AA is sufficient to achieve a ‘satisfactory’ rating.

Plan Goal 4: Community Development Investments (as % of Avg. Total Assets)*					
Plan Year	Satisfactory		Outstanding		Tier
	Annual	Cumulative**	Annual	Cumulative**	
2022	0.50%	0.60%	0.60%	0.72%	1
2023	0.50%	0.80%	0.60%	0.96%	1
2024	0.50%	1.00%	0.60%	1.20%	1

* Plan goals are presented based on Average Total Assets (as defined in the Glossary) as of December 31 of the calendar year immediately preceding the Plan Year identified in this table.

** Cumulative investment activity will be calculated on the basis of a quarterly weighted average for each Plan Year. For example, if an investment had an outstanding balance of \$1MM as of quarter-end for 4 of 4 quarters in the Plan Year, then \$1MM will be contributed to the Cumulative Goal. If this \$1MM investment maintained the same balance as of quarter-end for 2 of 4 quarters and no balance for the remaining 2 quarters, the investment would contribute \$500,000 to the cumulative plan goal. Progress on this goal will be tracked based on the average of the outstanding balance of all current or prior year qualified investments as of the quarter-end date for each of the four quarters in the Plan Years.

Goal Rationale:

University Bank is committed to ensuring that the Bank maintains a strong level of investment in qualifying community development activities in the defined AA. In furtherance of this commitment, the plan goals above have been established based on the capacity of the Bank as demonstrated by historic performance in recent years and by peer performance in the AA.

Goal targets are in alignment with historic community development investment performance of the Bank and selected peer institutions, as indicated by the summary table below and are believed to be a strong commitment to continued community development activities in the AA.

Peer Comparison: Community Development Investments in AA			
Institution	Performance Period	Total # of Inv.	Total \$ Vol. of Inv.
University Bank	2021 <i>(ytd)</i> ***	2 investments	\$3,125,000
Bank of Ann Arbor*	2015 – 2017	6 investments	\$7,113,000
Level One Bank**	2017 – 2020	No investments	\$0
Flagstar Bank FSB	2014 – 2017	20 investments	\$11,313,000
Northstar Bank	2015 – 2019	1 investment	\$608,300

* 2015 figures include \$1,866M in prior period investments.

** Level One Bank had no reportable CD investments during the analysis period in the Ann Arbor MSA. This bank recently acquired branches in the AA, resulting in no reportable activity during the review period.

*** The public PE notes that the Bank became an ISB on January 1, 2021 and only data for this performance year was used in the analysis.

As indicated in the table above, one peer institution reported no community development investment activity during the most recent public performance evaluation available. This peer, Level One Bank, is a large institution that was assessed on the basis of performance in multiple assessment areas and that originated no community development investments in the AA as it recently acquired branch locations in the area and had limited opportunity to make reportable investments given the timing of its entry into the market.

For the remaining three selected peers (two large banks and one intermediate small bank), the peers made \$2.3MM (Bank of Ann Arbor), \$3.7MM (Flagstar Bank FSB), and \$148M (Northstar Bank) in community development investments on an annualized basis after adjusting for the exact period of time considered in each respective performance evaluation (3.2 years for Bank of Ann Arbor, 3 years for Flagstar Bank FSB, and 4.1 years for Northstar Bank). Both large bank peers are considerably larger than University Bank on the basis of total assets, branch presence in the AA, and local deposits originating in the AA. The intermediate small bank peer is comparable to the Bank in asset size, branch presence, and local deposits (after adjustment for those deposits of University Bank that originate locally versus those that are generated by the Bank's subservicing activities); however, this peer is a smaller mortgage lender than the Bank. Given the comparatively limited presence of the Bank's branch structure and asset size relative to the large institutions and considering the context of Northstar Bank's limited performance given that institution's other assessment areas, we believe an annualized investment goal and a cumulative goal less than the average of these large bank peers, but greater than the historic community development investment activity of the Bank and that of this intermediate small bank peer to be a reasonable target with respect to this performance goal. For example, based on average total assets as of the September 30, 2021 Call Report, the 0.50% 'Satisfactory' performance goal would equate to an annual community development investment volume of

\$3,253,365, which appears to be well aligned to peer performance. Using the same asset balance, the cumulative ‘Satisfactory’ performance goal would rise from \$3,904,038 in the first year of the Plan to \$6,506,730 in the third year.

During assignment of a rating for this Plan Goal, examiners should assess performance under both the annual investment goals and the cumulative goals. In the event of different ratings between the annual and cumulative goals, the lesser of the respective ratings should be assigned for the Bank’s overall performance for this Plan Goal.

In addition, in relation to the community development lending activities discussed in Plan Goal 3, we believe the Bank’s business model is more conducive to achieving a greater relative volume of community development investment activity as this goal is more reliant on a strong CRA oversight and coordination program and less reliant on branch-level commercial banking activities, which as discussed throughout this Plan are generally not a major component of the Bank’s business model, as reflected in the Bank’s branch footprint, portfolio composition, and staffing levels. On this basis, and on the anticipated positive impact of CRA investments within the AA, we have rated this goal higher than community development lending activities and have placed a greater relative emphasis on the goal in terms of targeted dollar volume.

In the context of this Plan, we have elected to establish goals defined as a percentage of average total assets in order to accommodate potential adjustment in the Bank’s balance sheet from changing economic conditions. High levels of potentially sustained inflation, record levels of federal debt and spending, and significant demand and supply issues in the economy create high levels of uncertainty as to future economic performance that make estimates as to growth or contraction equally difficult in nature. In addition, the Bank anticipates no significant changes in its business model in the AA during the performance period that would significantly affect the structure, portfolio composition, branch network, or personnel of the Bank.

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Performance Goal 5: Community Development Grants and Donations

Goal Summary: Achieve a designated dollar volume of grants and donations meeting the CRA’s community development definition in the Ann Arbor, Michigan MSA AA.

Goal Targets: For the 2022, 2023, and 2024 plan years, the Bank will seek to originate a designated dollar volume of grants and donations expressed as a percentage of average total assets in the defined AA of Ann Arbor, Michigan MSA or on a regional or statewide basis as otherwise allowed by Part 345 or the FFIEC CRA FAQs.

Plan Goal 5: Community Development Grants & Donations (as % of Avg. Total Assets)*			
Plan Year	Satisfactory	Outstanding	Tier
2022	0.010%	0.012%	3
2023	0.010%	0.012%	3
2024	0.010%	0.012%	3

* Plan goals are presented based on Average Total Assets (as defined in the Glossary) as of December 31 of the calendar year immediately preceding the Plan Year identified in this table.

Goal Rationale:

University Bank is committed to ensuring that the Bank maintains a strong level of activity in qualifying community development grant or donation activities in the defined AA. In furtherance of this commitment, the plan goals above have been established based on the capacity of the Bank as demonstrated by historic performance in recent years and by peer performance in the AA.

Goal targets are in alignment with historic community development lending performance of the Bank and selected peer institutions, as indicated by the summary table below and are believed to be a strong commitment to continued community development activities in the AA.

Peer Comparison: Community Development Donations in AA			
Institution	Performance Period	Total # of Donations	Total \$ Vol. of Donations
University Bank	2021 (ytd) **	10 donations	\$82,000
Bank of Ann Arbor	2014 - 2018	107 donations	\$168,000
Level One Bank	2017 - 2020	4 donations	\$9,000
Flagstar Bank FSB*	2014 - 2017	No data	No data
Northstar Bank*	2015 - 2019	No data	No data

* No data regarding donation activity was included in the public performance evaluation.

** The public PE notes that the Bank became an ISB on January 1, 2021 and only data for this performance year was used in the analysis.

As indicated in the table above, peer data for community development donation activity is severely limited in availability for the selected peer institutions. The public performance evaluations for two peer institutions included no data regarding community development lending activity during the most recent public performance evaluation available. In addition, data for a third peer, Level One Bank, indicated a very low volume of donation activity during the evaluation period totaling only \$9,000.

Bank of Ann Arbor, the remaining peer, reported a total of \$168,000 during the 3.2 year evaluation period indicated in the public performance evaluation, approximating to \$52,500 of CRA donation activity on an annualized basis. Given the relative asset size of this peer institution and the historic performance of the Bank in this area during the last public performance evaluation, we believe a lower volume of donation activity is reasonable given Bank of Ann Arbor's asset size. Although a lower plan goal appears to be reasonable based on peer performance, the Bank's strong recent profitability and commitment to the community, in addition to the anticipated beneficial impact of donations and grants with respect to meeting local community development needs, has motivated the Bank to seek to maintain a comparatively high level of activity for this performance goal for the duration of the proposed Plan. For example, based on average total assets as of the September 30, 2021 Call Report, the 0.010% 'Satisfactory' performance goal would equate to an annual community development donation volume of \$65,067, which appears to be well aligned to peer performance.

In the context of this Plan, we have elected to establish goals defined as a percentage of average total assets in order to accommodate potential adjustment in the Bank's balance sheet from changing economic conditions. High levels of potentially sustained inflation, record levels of federal debt and spending, and significant demand and supply issues in the economy create high levels of uncertainty as to future economic performance that make estimates as to growth or contraction equally difficult in nature. In addition, the Bank anticipates no significant changes in its business model in the AA during the performance period that would significantly affect the structure, portfolio composition, branch network, or personnel of the Bank.

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Performance Goal 6: Community Development Service Hours

Goal Summary: Achieve a designated number of service hours meeting the CRA’s community development definition in the Ann Arbor, Michigan MSA AA.

Goal Targets: For the 2022, 2023, and 2024 plan years, the Bank will seek to dedicate the following number of full-time Community Bank staff hours toward qualifying community development activities in the Ann Arbor AA.

Plan Goal 6: Community Development Service Hours**			
Plan Year	Satisfactory	Outstanding	Tier
2022	10 Hours per Full Time Equivalent Employee*	12 Hours per Full Time Equivalent Employee*	3
2023	10 Hours per Full Time Equivalent Employee*	12 Hours per Full Time Equivalent Employee*	3
2024	10 Hours per Full Time Equivalent Employee*	12 Hours per Full Time Equivalent Employee*	3

* Based upon the number of equivalent FTEs employed as of December 31 of the year preceding the beginning of the next Plan Year (e.g. December 31, 2021 for the 2022 Plan Year). See the Glossary for further information.

** Subject to a minimum goal of total hours, as detailed below.

Goal Rationale:

For this plan goal, the Bank has elected to transition from a goal consisting of a fixed number of required community development service hours per year, to an hours per full-time-equivalent employee metric. This transition will align the Bank with the majority of its peer financial institutions and will allow the service hour goal to expand or shrink proportionally with the number of employees available to complete the service. As noted in the peer analysis table below, selected peer institution data regarding the number of service hours performed during the plan term is limited in nature as one peer evaluation included no service hour data for the AA and another evaluation only summarized service hours by the number of activities performed and included no reference to service hours.

Peer Comparison: Community Development Services in AA			
Institution	Performance Period	Total # of Services	Total Service Hours
University Bank	2018 - 2021 (<i>ytd</i>)	31 services	325 hours
Bank of Ann Arbor	2014 - 2018	344 services	No data
Level One Bank	2017 - 2020	5 services	84.5 hours
Flagstar Bank FSB*	2014 - 2017	No data	No data
Northstar Bank	2015 - 2019	3 services	244 hours

* No data regarding service hour activity was included in the public performance evaluation.

For selected peers, we noted that Northstar Bank reported an average of 59.5 hours of community development service hour activity within the 4.1 year period covered by the most recent public performance evaluation. Level One Bank reported an annualized volume of 31 hours for service hour activity within the AA. While it appears that Bank of Ann Arbor demonstrated a high level of activity, the absence of service hour data has limited the utility of this peer for comparative purposes.

Analysis of other financial institutions operating under CRA strategic plans⁶ reflect a range of per employee service hour goals of between 2 and 10 hours for a Satisfactory rating, and between 4 and 12 hours for an Outstanding rating. Management believes the goals established herein are reasonable for a Bank with far fewer employees than other peer institutions reviewed, which have reported employee totals ranging from 35 to 262, against the 23 employed by the Bank as of September 22, 2021 in its Community Banking business unit. The Bank has elected to align with the high end of the service hour goals identified in peer institutions with similar per-employee annual goals. The Bank believes the goals set forth are realistically reachable and maintainable with the current resources and employees available, and with expected organic growth in Bank staffing levels over the next three years of the plan. The Bank's goals are expressed in terms of the number of hours spent performing qualifying community development services, within the Bank's Ann Arbor, MI AA. At current staffing levels, the service hour goals would equate to a goal of 230 hours per year for a 'satisfactory' rating.

Access to financial literacy programs and financial education was identified as a significant secondary need based on the independent Community Needs Interviews commissioned by the Bank. In addition, providing expertise to qualifying entities and projects remains an important component of the Bank's role within the AA. In furtherance of this goal, the Bank has established the performance goals outlined above. We believe these service hours will provide a meaningful benefit within the AA and are reasonable in relation to historic performance of the Bank, peer performance, and identified community needs.

In order to provide consistency and ensure that changes in staffing levels do not adversely affect this Plan Goal, a minimum total hourly goal equivalent to 20 FTEs will be established as a performance floor for this Goal. This would equate to 200 service hours per year for a satisfactory rating.

In the context of this Plan, we have elected to establish plan goals tied to FTE levels to accommodate any changes in staffing due to improving or deteriorating economic conditions. High levels of potentially sustained inflation, record levels of federal debt and spending, and significant demand and supply issues in the economy create high levels of uncertainty as to future economic performance that make estimates as to growth or contraction equally difficult in nature. In addition, the Bank anticipates no significant changes in its business model in the AA during the performance period that would significantly affect the structure, portfolio composition, branch network, or personnel of the Bank.

⁶ See Strategic Plans for Western Alliance Bank, Stifel Bank, Silvergate Bank, Marlin Business Bank et al.

Other Performance Goals Evaluated/Not Included

Small Business Lending

Small business lending performance was evaluated for inclusion in this Strategic Plan; however, based on the historical loan origination activity for this product, current and projected business model of the Bank, and apparent community needs based on the Community Needs Interviews commissioned by the Bank, it was determined to omit small business lending as a performance goal for the proposed plan years.

As stated in the tables in the Assessment Area Analysis & Performance Context section of this Plan and summarized in the table below, the Bank originated 10 small business loans in the AA in 2018, 10 loans in 2019, and 85 loans in 2020, of which 74 of these transactions were loans originated through the SBA’s Payroll Protection Program.

Historic SMB Lending in AA 2018 - 2020		
Year	#	\$ Vol.
2018	10	\$2,637,000
2019	10	\$2,204,000
2020	85	\$7,515,000

In contrast, mortgage lending activity in the AA totaled the following:

Historic HMDA Lending Volume in AA 2018 - 2020	
Year	Total
2018	\$31,295,000
2019	\$85,080,000
2020	\$240,565,000
Total:	\$356,940,000
Average:	\$118,980,000

On a simple average basis, aggregate small business lending was equal to only 3.5% of mortgage lending volume over the assessment period. If outlier performance in 2020 is excluded from this calculation, small business lending was equal to 4.2% of mortgage lending activity in the AA for the 2018 and 2019 performance years; however, it should be noted that 2020 activity for small business lending is less likely to occur in proportion relative to mortgage lending activity as small business lending was inclusive of PPP activity, which appears highly unlikely to reoccur in future periods. Given the disparity in the dollar volume and number of transactions in the AA (e.g. the 2019 reporting year alone included over 300 HMDA-reportable transactions in the AA), it is clear that small business lending activity is not a significant line of business for the Bank. Based on these performance factors, it was determined to exclude small business lending as a plan goal for the proposed plan term; however, management will continue to evaluate small business lending performance to determine if inclusion of this factor as a plan goal is supported in the future.

GLOSSARY

Aggregate Lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

American Community Survey (ACS): A nationwide United States Census survey that produces demographic, social, housing, and economic estimates in the form of five-year estimates based on population thresholds.

Area Median Income: The median family income for the MSA, if a person or geography is located in an MSA; or the statewide nonmetropolitan median family income, if a person or geography is located outside an MSA.

Assessment Area or AA: A geographic area delineated by the bank under the requirements of the Community Reinvestment Act.

Average Total Assets: Year-to-date average of the total assets represented on the balance sheet and derived from CALL report data about the institution. Average total assets for the December 31 reporting period will be calculated based on the following formula (which is utilized in the summary data reported in the FDIC Institution Directory): **December reporting period** = (Previous December assets + March assets + June assets + September assets + December assets) / 5. The Summary Information report available in the Institution Directory may serve as an independent source for this information for any given Plan Year, which is available at the following URL: <https://www7.fdic.gov/idasp/advSearchLanding.asp>

Census Tract: A small, relatively permanent statistical subdivision of a county or equivalent entity. The primary purpose of census tracts is to provide a stable set of geographic units for the presentation of statistical data. Census tracts generally have a population size between 1,200 and 8,000 people, with an optimum size of 4,000 people. Census tract boundaries generally follow visible and identifiable features, but they may follow nonvisible legal boundaries in some instances. State and county boundaries always are census tract boundaries.

Combined Statistical Area (CSA): A combination of several adjacent metropolitan statistical areas or micropolitan statistical areas or a mix of the two, which are linked by economic ties.

Community Development: For loans, investments, and services to qualify as community development activities, their primary purpose must:

- (1) Support affordable housing for low- and moderate-income individuals;
- (2) Target community services toward low- and moderate-income individuals;
- (3) Promote economic development by financing small businesses or farms; or

- (4) Provide activities that revitalize or stabilize low- and moderate-income geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies.

Community Development Corporation (CDC): A CDC allows banks and holding companies to make equity type of investments in community development projects. Institution CDCs can develop innovative debt instruments or provide near-equity investments tailored to the development needs of the community. Institution CDCs are also tailored to their financial and marketing needs. A CDC may purchase, own, rehabilitate, construct, manage, and sell real property. Also, it may make equity or debt investments in development projects and in local businesses. The CDC activities are expected to directly benefit low- and moderate-income groups, and the investment dollars should not represent an undue risk on the banking organization.

Full-time Equivalent Employee: The calculation of full-time equivalent (FTE) is an employee's scheduled hours divided by the employer's hours for a full-time workweek. For a 40-hour workweek, employees who are scheduled to work 40 hours per week are 1.0 FTEs. Employees scheduled to work 20 hours per week are 0.5 FTEs. For this definition, the total number of FTEs will be determined based upon use of this formula. For example, if the Community Bank business unit employs fifteen full-time employees working a 40-hour workweek and ten part-time employees each working a 20 hour workweek, the number of full-time equivalent employees will be 20 based on the calculation: $[15 \times (40/40)] + [10 \times (20/40)] = 20$. For purposes of this calculation, part-time employees hours may be approximated and rounded to a representative figure based on employee schedules in effect at the time the total number of FTEs is to be calculated.

Geography: A census tract delineated by the U.S. Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants; the amount of loan requested; and the disposition of the application (approved, denied, and withdrawn).

Home Mortgage Loans: Includes closed-end mortgage loans or open-end line of credits as defined in the HMDA regulation that are not an excluded transaction per the HMDA regulation.

Housing Unit: Includes a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied as separate living quarters.

Income Level – Geography: The income rating of a geography, defined as a tract in which:

Low-Income — Median family income less than 50 percent of the area median income
Moderate-Income — Median family income at least 50 percent and less than 80 percent of the area median income

Middle-Income — Median family income at least 80 percent and less than 120 percent of the area median income

Upper-Income — Median family income at least 120 percent of the area median income

Income Level – Individual: The income rating of an individual natural-person borrower, defined as income that is:

Low-Income — Less than 50 percent of the area median income

Moderate-Income — At least 50 percent and less than 80 percent of the area median income

Middle-Income — At least 80 percent and less than 120 percent of the area median income

Upper-Income — At least 120 percent of area median income

LMI: Low-to-moderate income. A term indicating the borrower or tract falls within the low or moderate income definitions detailed above.

Low Income Housing Tax Credit: The Low-Income Housing Tax Credit Program is a housing program contained within the Internal Revenue Code of 1986, as amended. It is administered by the U.S. Department of the Treasury and the Internal Revenue Service. The U.S. Treasury Department distributes low-income housing tax credits to housing credit agencies through the Internal Revenue Service. The housing agencies allocate tax credits on a competitive basis.

Developers who acquire, rehabilitate, or construct low-income rental housing may keep their tax credits. Or, they may sell them to corporations or investor groups, who, as owners of these properties, will be able to reduce their own federal tax payments. The credit can be claimed annually for ten consecutive years. For a project to be eligible, the developer must set aside a specific percentage of units for occupancy by low-income residents. The set-aside requirement remains throughout the compliance period, usually 30 years.

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

Median Income: The median income divides the income distribution into two equal parts, one having incomes above the median and other having incomes below the median.

Metropolitan Division (MD): A county or group of counties within a CBSA that contain(s) an urbanized area with a population of at least 2.5 million. A MD is one or more main/secondary counties representing an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area (MSA): CBSA associated with at least one urbanized area having a population of at least 50,000. The MSA comprises the central county or counties or equivalent entities containing the core, plus adjacent outlying counties having a high degree of

social and economic integration with the central county or counties as measured through commuting.

Multi-family: Refers to a residential structure that contains five or more units.

Nonmetropolitan Area (also known as non-MSA): All areas outside of metropolitan areas. The definition of nonmetropolitan area is not consistent with the definition of rural areas. Urban and rural classifications cut across the other hierarchies. For example, there is generally urban and rural territory within metropolitan and nonmetropolitan areas.

Owner-Occupied Units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified Investment: A lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rated Area: A rated area is a state or multistate metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multistate metropolitan area, the institution will receive a rating for the multistate metropolitan area.

Rural Area: Territories, populations, and housing units that are not classified as urban.

Small Business Investment Company (SBIC): SBICs are privately-owned investment companies which are licensed and regulated by the Small Business Administration (SBA). SBICs provide long-term loans and/or venture capital to small firms. Because money for venture or risk investments is difficult for small firms to obtain, SBA provides assistance to SBICs to stimulate and supplement the flow of private equity and long-term loan funds to small companies. Venture capitalists participate in the SBIC program to supplement their own private capital with funds borrowed at favorable rates through SBA's guarantee of SBIC debentures. These SBIC debentures are then sold to private investors. An SBIC's success is linked to the growth and profitability of the companies that it finances. Therefore, some SBICs primarily assist businesses with significant growth potential, such as new firms in innovative industries. SBICs finance small firms by providing straight loans and/or equity-type investments. This kind of financing gives them partial ownership of those businesses and the possibility of sharing in the companies' profits as they grow and prosper.

Small Business Loan: A loan included in "loans to small businesses" as defined in the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$1 million or less and are either secured by nonfarm nonresidential properties or are classified as commercial and industrial loans.

Small Farm Loan: A loan included in "loans to small farms" as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have

original amounts of \$500,000 or less and are either secured by farmland, including farm residential and other improvements, or are classified as loans to finance agricultural production and other loans to farmers.

Underserved Middle-Income Nonmetropolitan Geographies: A nonmetropolitan middle-income geography will be designated as underserved if it meets criteria for population size, density, and dispersion indicating the area's population is sufficiently small, thin, and distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs.

Upper-Income: Individual income that is 120 percent or more of the area median income, or a median family income that is 120 percent or more in the case of a geography.

Urban Area: All territories, populations, and housing units in urbanized areas and in places of 2,500 or more persons outside urbanized areas. More specifically, "urban" consists of territory, persons, and housing units in places of 2,500 or more persons incorporated as cities, villages, boroughs (except in Alaska and New York), and towns (except in the New England states, New York, and Wisconsin).

"Urban" excludes the rural portions of "extended cities"; census designated place of 2,500 or more persons; and other territory, incorporated or unincorporated, including in urbanized areas.

Appendix A: Rating System

Points - Rating System Illustrative Examples

The following examples are provided to demonstrate how the points and rating system developed for use of evaluating performance under University Bank’s CRA Strategic Plan will function under various performance scenarios. The point system is summarized below:

Points Matrix		
Ratings	Base Value	Definition
Outstanding	12	120% of PG
High Satisfactory	9	110% of PG
Satisfactory	6	100% of PG
Low Satisfactory	4	90% of PG
Needs to Improve	2	80% of PG
Substantial Noncompliance	0	< 80% of PG

Plan goals are assigned a tier rating to ‘weight’ the plan goal’s relative importance in contrast to the overall Strategic Plan. The tiers are summarized below:

Goal Level: Point Multipliers	
Tier 1	1.5x
Tier 2	1.0x
Tier 3	0.5x

Overall ratings are based on the total amount of points earned during a given plan year. The total points for each plan goal are determined based on the degree to which the plan goal was achieved. If a plan goal was 100% achieved, a satisfactory rating will be assigned. If the plan goal is met and exceeded by 10% (or performance equals 110% of goal performance), a ‘high satisfactory’ rating is assigned with a corresponding number of points. Points are adjusted based on the goal tier, which is a multiplier ranging from 0.50x to 1.5x. Based on the aggregate total of points earned, one of the following ratings will be assigned:

Overall Rating - Required Goal Scores	
Ratings	Total Pts to Earn
Outstanding	60+
Satisfactory	36 - 59
Needs to Improve	18 - 35
Substantial Noncompliance	< 18

Illustrative Examples:

The following examples are provided to illustrate how the points system will function under various performance scenarios. The purpose of these examples is to demonstrate that the points system is balanced and reasonable in construction.

Example 1

Tier 1 Goals	Min	Max	Simulated Pts	Rating
HMDA LMI Borrowers	3	18	6	Low Satisfactory
HMDA LMI Geographies	3	18	14	High Satisfactory
CD Investments	3	18	18	Outstanding
Tier 2 Goals				
CD Lending	2	12	6	Satisfactory
Tier 3 Goals				
CD Donations	1	6	3	Satisfactory
CD Service Hours	1	6	3	Satisfactory
Min - Max Pts.	13	78	50	Satisfactory

Example 2

Tier 1 Goals	Min	Max	Simulated Pts	Rating
HMDA LMI Borrowers	3	18	18	Outstanding
HMDA LMI Geographies	3	18	0	Substantial Non-Compliance
CD Investments	3	18	0	Substantial Non-Compliance
Tier 2 Goals				
CD Lending	2	12	12	Outstanding
Tier 3 Goals				
CD Donations	1	6	0	Substantial Non-Compliance
CD Service Hours	1	6	0	Substantial Non-Compliance
Min - Max Pts.	13	78	30	Needs to Improve

Example 3

Tier 1 Goals	Min	Max	Simulated Pts	Rating
HMDA LMI Borrowers	3	18	6	Low Satisfactory
HMDA LMI Geographies	3	18	6	Low Satisfactory
CD Investments	3	18	6	Low Satisfactory
Tier 2 Goals				
CD Lending	2	12	4	Low Satisfactory
Tier 3 Goals				
CD Donations	1	6	2	Low Satisfactory
CD Service Hours	1	6	2	Low Satisfactory
Min - Max Pts.	13	78	26	Needs to Improve

Example 4

Tier 1 Goals	Min	Max	Simulated Pts	Rating
HMDA LMI Borrowers	3	18	9	Satisfactory
HMDA LMI Geographies	3	18	9	Satisfactory
CD Investments	3	18	9	Satisfactory
Tier 2 Goals				
CD Lending	2	12	6	Satisfactory
Tier 3 Goals				
CD Donations	1	6	3	Satisfactory
CD Service Hours	1	6	3	Satisfactory
Min - Max Pts.	13	78	39	Satisfactory

Example 5

Tier 1 Goals	Min	Max	Simulated Pts	Rating
HMDA LMI Borrowers	3	18	9	Satisfactory
HMDA LMI Geographies	3	18	14	High Satisfactory
CD Investments	3	18	18	Outstanding
Tier 2 Goals				
CD Lending	2	12	6	Satisfactory
Tier 3 Goals				
CD Donations	1	6	6	Outstanding
CD Service Hours	1	6	6	Outstanding
Min - Max Pts.	13	78	59	Satisfactory

Example 6

Tier 1 Goals	Min	Max	Simulated Pts	Rating
HMDA LMI Borrowers	3	18	18	Outstanding
HMDA LMI Geographies	3	18	14	High Satisfactory
CD Investments	3	18	18	Outstanding
Tier 2 Goals				
CD Lending	2	12	6	Satisfactory
Tier 3 Goals				
CD Donations	1	6	3	Satisfactory
CD Service Hours	1	6	3	Satisfactory
Min - Max Pts.	13	78	62	Outstanding

Example 7

Tier 1 Goals	Min	Max	Simulated Pts	Rating
HMDA LMI Borrowers	3	18	9	Satisfactory
HMDA LMI Geographies	3	18	9	Satisfactory
CD Investments	3	18	9	Satisfactory

Tier 2 Goals					
CD Lending	2	12	12	Outstanding	
Tier 3 Goals					
CD Donations	1	6	6	Outstanding	
CD Service Hours	1	6	6	Outstanding	
Min - Max Pts.	13	78	51	Satisfactory	

Example 8

Tier 1 Goals	Min	Max	Simulated Pts	Rating	
HMDA LMI Borrowers	3	18	3	Needs to Improve	
HMDA LMI Geographies	3	18	3	Needs to Improve	
CD Investments	3	18	3	Needs to Improve	
Tier 2 Goals					
CD Lending	2	12	2	Needs to Improve	
Tier 3 Goals					
CD Donations	1	6	1	Needs to Improve	
CD Service Hours	1	6	1	Needs to Improve	
Min - Max Pts.	13	78	13	Substantial Non-compliance	

Example 9

Tier 1 Goals	Min	Max	Simulated Pts	Rating	
HMDA LMI Borrowers	3	18	6	Low Satisfactory	
HMDA LMI Geographies	3	18	6	Low Satisfactory	
CD Investments	3	18	9	Satisfactory	
Tier 2 Goals					
CD Lending	2	12	6	Satisfactory	
Tier 3 Goals					
CD Donations	1	6	3	Satisfactory	
CD Service Hours	1	6	3	Satisfactory	
Min - Max Pts.	13	78	33	Needs to Improve	

Example 10

Tier 1 Goals	Min	Max	Simulated Pts	Rating	
HMDA LMI Borrowers	3	18	6	Low Satisfactory	
HMDA LMI Geographies	3	18	6	Low Satisfactory	
CD Investments	3	18	14	High Satisfactory	
Tier 2 Goals					
CD Lending	2	12	6	Satisfactory	
Tier 3 Goals					
CD Donations	1	6	3	Satisfactory	
CD Service Hours	1	6	3	Satisfactory	
Min - Max Pts.	13	78	38	Satisfactory	

SECTION B
PUBLIC COMMENTS

PUBLIC COMMENTS

No Public Comments Have Been Submitted

Updated as of March 31, 2024

SECTION C

CRA PERFORMANCE EVALUATION

PUBLIC DISCLOSURE

June 21, 2021

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

University Bank
Certificate Number: 14587

2015 Washtenaw Avenue
Ann Arbor, Michigan 48104

Federal Deposit Insurance Corporation
Division of Depositor and Consumer Protection
Chicago Regional Office

300 South Riverside Plaza, Suite 1700
Chicago, Illinois 60606

This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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INSTITUTION RATING

INSTITUTION'S CRA RATING: This institution is rated **Satisfactory**.

An institution in this group has a satisfactory record of helping to meet the credit needs of its assessment area, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

University Bank's (UB) satisfactory Community Reinvestment Act performance under both the Lending Test and Community Development Test supports the overall rating. The following points summarize the institution's performance under each test.

The Lending Test is rated Satisfactory.

- The loan-to-deposit (LTD) ratio is reasonable given the institution's size, financial condition, and assessment area (AA) credit needs.
- The bank made a majority of its home mortgage and small business loans within the AA.
- The geographic distribution of loans reflects reasonable dispersion throughout the AA.
- The distribution of borrowers reflects reasonable penetration of loans among borrowers of different income levels and businesses of different sizes.
- The institution did not receive any CRA-related complaints since the previous evaluation; therefore, this factor did not affect the Lending Test.

The Community Development Test is rated Satisfactory.

The institution's community development performance demonstrates adequate responsiveness to the community development needs within its AA through community development loans, qualified investments, and community development services, as appropriate, considering the institution's capacity, recent growth, and the need and availability of such opportunities for community development in the institution's AA.

DESCRIPTION OF INSTITUTION

UB is a community bank headquartered in Ann Arbor, Michigan, and wholly-owned by University Bancorp, Inc., a one-bank holding company also located in Ann Arbor, Michigan. The bank operates in Washtenaw County in southeastern Michigan. UB received a Satisfactory rating at its previous CRA Performance Evaluation using Interagency Small Institution Examination procedures, dated May 18, 2015.

One full-service branch operates within the main office, in an upper-income census tract. UB opened a Loan Production Office (LPO) in 2021 in a middle-income census tract in Ypsilanti, Michigan. UB offers various deposit products and mortgage, commercial, and consumer loans. The bank owns three automated teller machines (ATMs) at various locations in Ann Arbor and Ypsilanti. It is also part of the Allpoint ATM network, which provides free ATM access to UB customers. Additionally, the bank offers electronic banking via its website and a mobile banking application. Further information including the specific products offered, bank address, and hours of operation can be found at <http://www.university-bank.com>.

According to the Call Report dated March 31, 2021, the institution reported total assets of approximately \$658.5 million, total loans of \$304.9 million, total deposits of \$538.1 million, and total securities of \$3.0 million. UB experienced significant growth within all balance sheet categories since the prior evaluation, when total assets were \$127.0 million and total loans were \$91.6 million. During the evaluation period, total assets increased by 418.5 percent and total loans increased by 232.9 percent. The institution's strong growth includes significant increases in the volume of mortgages originated and sold on the secondary market, while retaining servicing. UB also has a significant level of zero-interest deposits. The following table illustrates the loan portfolio distribution as of March 31, 2021.

Loan Portfolio Distribution as of 03/31/2021		
Loan Category	\$(000s)	%
Construction, Land Development, and Other Land Loans	9,208	3.0
Secured by Farmland	0	0.0
Secured by 1-4 Family Residential Properties	221,701	72.7
Secured by Multifamily (5 or more) Residential Properties	661	0.2
Secured by Nonfarm Nonresidential Properties	46,455	15.2
Total Real Estate Loans	278,025	91.1
Commercial and Industrial Loans	17,465	5.7
Agricultural Production and Other Loans to Farmers	0	0.0
Consumer Loans	174	0.1
Obligations of State and Political Subdivisions in the U.S.	0	0.0
Other Loans	9,274	3.0
Lease Financing Receivable (net of unearned income)	0	0.0
Less: Unearned Income	0	0.0
Total Loans	304,938	100.0
<i>Source: Reports of Condition and Income 03/31/2021. Due to rounding, may not equal 100.0%</i>		

Midwest Loan Services, a subsidiary of UB until 2016, is now a division of the bank and provides loan servicing and subservicing for financial institutions across the county. The following UB subsidiaries engage in significant lending activity.

University Lending Group (ULG)

ULG provides residential mortgages including conventional (fixed and adjustable rate mortgages (ARMs)), Fair Housing Administration (FHA), streamlined FHA 203(k), Veterans Affairs (VA), United State Department of Agriculture Rural Development, Home Equity Lines of Credit (HELOCs), jumbo, and construction loans. ULG sells to Fannie Mae, Freddie Mac, and various investors. It originates and sells three products to UB: conventional 7/1 ARMs, Habitat for Humanity loans, and first lien HELOCs. ULG has LPOs in Florida, Indiana, Michigan, Tennessee, and Texas, and actively lends in 12 states. UB has elected to have ULG's home mortgage loans considered within the Lending Test portion of this evaluation.

University Islamic Financial Corporation (UIF)

UIF provides faith-based financing solutions for those who have ethical aversions to paying or receiving interest. UIF provides two faith-based home financing alternatives: installment sales contracts and declining partnership balances. Both programs comply with faith-based principles. UIF sells to Fannie Mae and Freddie Mac. UIF is licensed and operates in 26 states and has origination offices in Michigan, California, Illinois, Minnesota, New Jersey, Texas, and Virginia. UB elected to have UIF mortgage activities considered within the Lending Test portion of this evaluation.

Midwest Loan Solutions (MLS)

MLS served as a wholesale lender, which provided third party originations until March 1, 2020, when it discontinued the program. MLS now originates reverse mortgages under the name 1st Nations Reverse Mortgage and originates the product in 34 states. UB has not elected to have MLS' activities considered within this evaluation.

No merger or acquisition activity occurred since the prior examination. There are no legal or financial impediments that would affect the bank's ability to meet the AA's credit needs.

DESCRIPTION OF ASSESSMENT AREA

The bank designated the entirety of Washtenaw County as its AA. Washtenaw County is located in the southeastern portion of Michigan and comprises the entirety of the Ann Arbor, MI Metropolitan Statistical Area (MSA). The largest city in the AA is Ann Arbor, while just east lies Ypsilanti, the other large center of commerce and industry in the county. Washtenaw County is located directly west of Wayne County, which contains the City of Detroit, MI.

Economic and Demographic Data

According to the 2015 American Community Survey (ACS) data, there are 100 census tracts within the bank's AA with the following income designations: 16 low-income, 16 moderate-income, 37 middle-income, 25 upper-income, and 6 tracts with no income designation. Low- and moderate-

income tracts are mostly in and around the City of Ypsilanti, on the east side of the county, with a few moderate-income tracts near Ann Arbor. The tracts with no income designation include Willow Run Airport in Ypsilanti, and tracts in downtown Ann Arbor comprised of the University of Michigan. The following table illustrates select demographic information about the AA.

Demographic Information of the Assessment Area						
University Bank Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	100	16.0	16.0	37.0	25.0	6.0
Population by Geography	354,092	14.9	12.9	40.2	27.6	4.4
Housing Units by Geography	149,098	15.8	14.1	40.5	27.5	2.0
Owner-Occupied Units by Geography	82,525	6.6	12.0	44.7	36.5	0.2
Occupied Rental Units by Geography	55,542	28.7	17.6	34.3	15.0	4.4
Vacant Units by Geography	11,031	20.0	12.6	41.1	23.1	3.2
Businesses by Geography	28,343	9.0	9.2	42.5	32.5	6.8
Farms by Geography	925	3.5	6.2	56.5	33.4	0.4
Family Distribution by Income Level	79,373	22.7	17.0	19.6	40.7	0.0
Household Distribution by Income Level	138,067	25.4	15.9	15.8	42.9	0.0
Median Family Income MSA - 11460 Ann Arbor, MI MSA		\$87,331	Median Housing Value			\$208,543
			Median Gross Rent			\$1,001
			Families Below Poverty Level			8.0%
<i>Source: 2015 ACS and 2020 D&B Data. Due to rounding, totals may not equal 100.0%</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The Geographic Distribution criterion compares the institution’s home mortgage lending to the distribution of owner-occupied housing units in the AA. According to 2015 ACS data, there are 149,098 housing units within the AA, of which 82,525 (55.3 percent) are owner-occupied, 55,542 (37.3 percent) are occupied rental units, and 11,031 (7.4 percent) are vacant.

The analysis of small business loans under the Borrower Profile criterion compares the distribution of the institution’s small business loans by gross annual revenue (GAR) of the business. According to 2020 D&B data, there are 28,343 non-farm businesses operating within the AA. Of these businesses, 89.3 percent operate from a single location, 61.2 percent have four or fewer employees, and 85.2 percent have GARs of \$1 million or less.

The service industry represents the largest percentage of businesses in the AA at 45.3 percent; followed by non-classifiable establishments (18.2 percent); retail trade (11.0 percent); and finance, insurance, and real estate (7.7 percent). The University of Michigan drives the high volume of non-classifiable establishments, with 34,495 employees. According to Moody’s March 2021 data, other large employers within the AA include Trinity Health (7,585 employees) and General Motors Milford Proving Grounds (5,500 employees).

Examiners consider unemployment data when evaluating an institution’s ability to lend within its AA. During the evaluation period, the unemployment rate in the MSA rose significantly due to the 2020 COVID-19 pandemic, before dropping to near pre-pandemic levels in April 2021 (the most recent data available). Unemployment in the MSA remained lower than both the state and national averages, where similar fluctuations in unemployment occurred. The following table illustrates relevant unemployment rates during the evaluation period.

Unemployment Rates			
Area	2019	2020	April 2021
	%	%	%
Ann Arbor, MI MSA	2.8	6.4	4.0
State	4.1	9.9	4.6
National Average	3.6	8.1	5.8

Source: Bureau of Labor Statistics.

Examiners utilized the FFIEC-updated median family income to analyze home mortgage loans under the Borrower Profile criterion. The following table shows the low-, moderate-, middle-, and upper-income categories for this AA.

Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
Ann Arbor, MI MSA Median Family Income (11460)				
2019 (\$101,200)	<\$50,600	\$50,600 to <\$80,960	\$80,960 to <\$121,440	≥\$121,440
2020 (\$101,500)	<\$50,750	\$50,750 to <\$81,200	\$81,200 to <\$121,800	≥\$121,800

Source: FFIEC

Competition

There is a moderate level of competition for financial services in the AA. According to FDIC Deposit Market Share data as of June 30, 2020, 19 FDIC-insured financial institutions operated 87 offices within the AA. Of these institutions, UB ranked 8th with 4.0 percent of the deposit market share. In addition to FDIC-insured institutions, local credit unions and other financial service providers represent additional competition. The top five institutions accounted for 67.0 percent of the deposit market share.

There is a high level of competition in the AA for home mortgage loans. In 2019 (the most recent data available), 407 lenders subject to the Home Mortgage Disclosure Act (HMDA) reported 19,102 home mortgage loans originated or purchased within the AA. UB ranked 96th and held 0.1 percent of the market share. Conversely, ULG ranked 13th with 1.1 percent, and UIF ranked 214th with a negligible portion of the market share. Combined, the three organizations originated 2.2 percent of the market share in the AA. By number, the top five lenders comprised 23.2 percent of the home mortgage lending market share.

There is also a high level of competition in the AA for small business loans. Although UB and its subsidiaries are not required to report small business loan data, aggregate CRA data is useful in determining the level of competition in the AA for small business lending. In 2019 (the most recent data available), 81 lenders subject to CRA data collection requirements originated or purchased 7,606 small business loans throughout the AA. The top five lenders accounted for 67.8 percent of all small business loans.

Community Contact

Examiners were unable to conduct a community contact interview to assist in identifying the credit needs and community development opportunities within the AA. In the absence of a community contact, examiners reviewed a local institution's community needs assessment and found that there is a significant need for affordable housing throughout the AA. Housing costs within the AA are high, and a shortage of affordable housing prevents many low- and moderate-income individuals from living near their place of employment.

Credit and Community Development Needs and Opportunities

Considering information from the needs assessment and the demographic and economic data, examiners determined that opportunities to provide affordable housing exist within the AA.

SCOPE OF EVALUATION

General Information

This evaluation covers the period from the prior evaluation dated May 18, 2015, to the current evaluation dated June 21, 2021. Examiners utilized the Interagency Intermediate Small Institution Examination Procedures to evaluate UB's CRA performance. These procedures include the Lending Test and the Community Development Test. Performance criteria for each of these tests are contained in the first Appendix. Banks must achieve a rating of at least "Satisfactory" under each test to obtain an overall "Satisfactory" rating.

Activities Reviewed

Examiners determined that the bank's major product lines are home mortgage and small business loans. This conclusion considered the number and dollar volume of loans originated and purchased during the evaluation period, the composition of the bank's loan portfolio, and its business strategy. In addition to the home mortgage loans originated and purchased by UB, examiners considered the home mortgage loans originated by ULG and UIF at the bank's option.

Examiners considered all home mortgage loans reported on the 2019 and 2020 HMDA Loan Application Registers for UB, ULG, and UIF. In 2019, UB originated 44 loans totaling 14.7 million, ULG originated 2,941 home mortgage loans totaling \$641.1 million, and UIF originated 1,584 loans totaling \$410.9 million. In 2020, UB originated 31 loans totaling 7.8 million, ULG originated 5,178 loans totaling \$1.3 billion, and UIF originated 3,383 loans totaling \$938.0 million.

Examiners also analyzed the bank's 2019 and 2020 small business lending activities. The bank originated 17 loans totaling approximately \$4.0 million in 2019 and 142 loans totaling \$15.5 million in 2020. The large increase in 2020 is due mainly to the bank's participation in the Paycheck Protection Program (PPP) established by the Coronavirus Aid, Relief, and Economic Security Act (CARES Act) which provided aid to businesses, self-employed workers, sole proprietors, non-profit organizations, and tribal businesses so they could continue paying their workers during the COVID-19 pandemic. Of the 142 small business loans originated in 2020, 119 were under this program.

Examiners determined that no other loan types, such as small farm or consumer loans, comprised major product lines and were not included in the evaluation.

For the Lending Test, examiners considered the number and dollar volume of home mortgage and small business loans. Examiners emphasized performance by number of loans because it is a better indicator of the number of individuals and businesses served. As the bank is primarily a home mortgage lender, performance in this area carried more weight in the overall conclusions.

For the Community Development Test, examiners considered all applicable community development loans, qualified investments and donations, and community development services since the prior evaluation, dated May 18, 2015. Based on its asset size, UB became an Intermediate Small Bank in January 1, 2021; however, it recorded some community development information for prior years as discussed in the Community Development section, later in this evaluation.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

UB demonstrated reasonable performance under the Lending Test. Reasonable performance under each criterion supports this conclusion.

Loan-to-Deposit Ratio

The LTD ratio is reasonable given UB's size, financial condition, and AA credit needs. The bank's LTD ratio, calculated from Call Report data, averaged 65.9 percent over the previous 24 quarters dating from June 30, 2015 through March 31, 2021. The LTD ratio ranged from a high of 87.6 percent on June 30, 2015, to a low of 53.7 percent on March 31, 2018. The ratio remained relatively stable, with general fluctuations over time. UB's performance falls within the range of three similarly-situated institutions (SSIs), which examiners selected based on loan portfolio distribution, size, and geographic location. The following table demonstrates the bank's performance as it compares to these SSIs.

Loan-to-Deposit Ratio Comparison		
Bank	Total Assets as of 3/31/2021 (\$000s)	Average Net LTD Ratio (%)
University Bank	658,534	65.9
Similarly-Situated Institution #1	560,786	58.3
Similarly-Situated Institution #2	726,236	90.4
Similarly-Situated Institution #3	449,296	75.6
<i>Source: Reports of Condition and Income 6/30/2015 – 3/31/2021</i>		

Assessment Area Concentration

By number, UB originated or purchased a majority of its home mortgage and small business loans within its AA during the review period. By dollar volume, the bank originated the majority of home mortgage loans within the AA, and 50.0 percent of small business loans in the AA, as reflected in the following table. The bank experienced a decline in the dollar volume of small business loans within the AA in 2020, as it granted a significant number of loans under the SBA PPP and many with larger balances were outside the AA. Only loans originated by UB are presenting within the Assessment Area Concentration portion of the Lending Test.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2019	35	79.5	9	20.5	44	11,282	76.5	3,457	23.5	14,740
2020	21	67.7	10	32.3	31	6,079	78.3	1,680	21.7	7,759
Subtotal	56	74.7	19	25.3	75	17,361	77.2	5,137	22.8	22,499
Small Business										
2019	10	58.8	7	41.2	17	2,204	55.7	1,751	44.3	3,955
2020	85	59.9	57	40.1	142	7,515	48.6	7,950	51.4	15,465
Subtotal	95	59.8	64	40.2	159	9,719	50.0	9,701	50.0	19,420
Total	151	64.5	83	35.5	234	27,080	64.6	14,838	35.4	41,919
<i>Source: Bank Data. Due to rounding, totals may not equal 100.0%</i>										

For home mortgage loans, the following geographic distribution and borrower profile portions of the Lending Test include loans within the AA by UB, as well as ULG and UIF. For small business loans, only those originated by UB are considered.

Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion throughout the AA. Reasonable performance within home mortgage lending, and poor performance within small business lending supports this conclusion.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects reasonable dispersion throughout the AA. Within both low- and moderate-income tracts, UB and its subsidiaries granted percentages of loans similar to both the percent of owner-occupied housing in both 2019 and 2020, and aggregate performance of other HMDA-reporting institutions in 2019. The following table illustrates the combined geographic distribution of home mortgage loans for the three entities in 2019 and 2020.

Geographic Distribution of Home Mortgage Loans						
University Bank Assessment Area						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2019	6.6	6.5	25	7.8	4,367	5.3
2020	6.6	--	56	6.2	9,986	4.2
Moderate						
2019	12.0	12.0	48	15.0	9,248	11.2
2020	12.0	--	102	11.2	19,784	8.3
Middle						
2019	44.7	46.0	134	42.0	33,474	40.4
2020	44.7	--	373	41.1	91,277	38.3
Upper						
2019	36.5	35.2	112	35.1	35,702	43.1
2020	36.5	--	374	41.2	116,323	48.9
Not Available						
2019	0.2	0.3	0	0.0	0	0.0
2020	0.2	--	2	0.2	688	0.3
Totals						
2019	100.0	100.0	319	100.0	82,791	100.0
2020	100.0	--	907	100.0	238,058	100.0

Source: 2015 ACS; Bank Data, 2019 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

Small Business Loans

The geographic distribution of small business loans reflects poor dispersion throughout the AA. In 2019, UB made no loans within the low-income tracts. In 2020, it originated just four loans within low-income tracts, and all were SBA PPP loans. In both years, bank performance fell below the percentage of businesses in low-income tracts.

Within the moderate-income tracts, the bank again made no loans in 2019 and just five loans in 2020, including four SBA PPP loans. This activity level again trails the percentage of businesses within these moderate-income tracts. The following table demonstrates the geographic distribution of UB's 2019 and 2020 small business lending within the AA.

Geographic Distribution of Small Business Loans					
University Bank Assessment Area					
Tract Income Level	% of Businesses	#	%	\$(000s)	%
Low					
2019	8.9	0	0.0	0	0.0
2020	9.0	4	4.7	161	2.1
Moderate					
2019	9.2	0	0.0	0	0.0
2020	9.2	5	5.9	372	5.0
Middle					
2019	42.7	4	40.0	1,116	50.6
2020	42.5	37	43.5	1,992	26.5
Upper					
2019	32.0	6	60.0	1,088	49.4
2020	32.5	36	42.4	4,584	61.0
Not Available					
2019	7.2	0	0.0	0	0.0
2020	6.8	3	3.5	406	5.4
Totals					
2019	100.0	10	100.0	2,204	100.0
2020	100.0	85	100.0	7,515	100.0
<i>Source: 2019 & 2020 D&B Data; Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%</i>					

Borrower Profile

The distribution of borrowers reflects reasonable performance overall, with reasonable penetration among borrowers of different income levels and excellent penetration among businesses of different sizes.

Home Mortgage Loans

The distribution of borrowers reflects reasonable penetration among borrowers of different income levels. While UB and its subsidiaries' level of lending to low-income borrowers fell below the percentage of families in each year, it was similar to the aggregate performance of HMDA-reporting institutions in 2019. The percentage of loans to low-income borrowers increased slightly in 2020. ACS data also shows that 8.0 percent of families in the AA had income below the poverty level. These families are unlikely to qualify for loans in the amounts sufficient to purchase a home in the AA, especially considering the median housing value of \$208,543.

Lending to moderate-income borrowers exceeded both the percentage of moderate-income families in both years, as well as the aggregate performance of HMDA-reporting institutions within the AA

in 2019. The following table illustrates the combined borrower profile performance for the three entities in 2019 and 2020.

Distribution of Home Mortgage Loans by Borrower Income Level						
University Bank Assessment Area						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2019	22.7	10.2	26	8.2	3,303	4.0
2020	22.7	--	81	8.9	11,913	5.0
Moderate						
2019	17.0	21.0	78	24.5	16,005	19.3
2020	17.0	--	199	21.9	39,799	16.7
Middle						
2019	19.6	24.1	92	28.8	21,543	26.0
2020	19.6	--	250	27.6	65,231	27.4
Upper						
2019	40.7	36.0	111	34.8	38,206	46.1
2020	40.7	--	357	39.4	116,009	48.7
Not Available						
2019	0.0	8.8	12	3.8	3,734	4.5
2020	0.0	--	20	2.2	5,106	2.1
Totals						
2019	100.0	100.0	319	100.0	82,791	100.0
2020	100.0	--	907	100.0	238,058	100.0
<i>Source: 2015 ACS; Bank Data, 2019 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>						

As discussed earlier, UB and its subsidiaries actively participate in an array of local and federal home loan programs. These programs, as detailed below and included in the table above, provide lending opportunities to low- and moderate-income borrowers and first time homebuyers who may not otherwise qualify for credit. This further illustrates the organization’s commitment to serve the needs of its communities.

- **FHA and VA:** These loans allow for no or low down payments, low closing costs, and unique underwriting specifically for first time homebuyers.
- **Michigan State Housing Development Authority:** These loans allow for no or low down payment, down payment assistance, and flexible underwriting and mortgage options for first time homebuyers and, in certain instances, repeat homebuyers.
- **ULG Habitat for Humanity Program:** ULG offers a loan program through the Washtenaw County Habitat for Humanity, enabling low- and moderate-income borrowers to purchase a

primary residence. The program uses special criteria when qualifying and approving homebuyers for Habitat for Humanity.

- Freddie Home Possible and Fannie HomeReady: These loans allow for low down payments, particularly for first time homebuyers.

Small Business Loans

The distribution of borrowers reflects, given the demographics of the AA, excellent penetration among businesses of different sizes. In 2019, the bank originated 100.0 percent of small business loans in the AA to businesses with GARs of \$1 million or less, which significantly exceeded the percentage of businesses within that revenue category.

During 2020, the bank originated 74 SBA PPP loans within its AA. These loans did not require the bank to collect the borrowers’ revenue information and are included in the “Revenue Not Available” section of the table below. Excluding the PPP loans, UB originated 81.8 percent of small business loans in the AA in 2020 to businesses with GARs of \$1 million or less. This performance fell slightly below the percent of businesses within that revenue category in 2020.

The following table illustrates UB’s lending to small businesses, including the percentage of businesses based on GAR level.

Distribution of Small Business Loans by Gross Annual Revenue Category					
University Bank Assessment Area					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
<=\$1,000,000					
2019	83.3	10	100.0	2,204	100.0
2020	85.2	9	10.6	2,089	27.8
>\$1,000,000					
2019	5.9	0	0.0	0	0.0
2020	5.2	1	1.2	250	3.3
Revenue Not Available					
2019	10.8	0	0.0	0	0.0
2020	9.6	75	88.2	5,176	68.9
Totals					
2019	100.0	10	100.0	2,204	100.0
2020	100.0	85	100.0	7,515	100.0

*Source: 2019 & 2020 D&B Data; Bank Data; "--" data not available.
Due to rounding, totals may not equal 100.0%*

Response to Complaints

The bank did not receive any CRA-related complaints since the previous evaluation; therefore, this criterion did not affect the Lending Test rating.

COMMUNITY DEVELOPMENT TEST

UB’s community development performance demonstrates adequate responsiveness to community development needs in its AA through community development loans, qualified investments, and community development services, as appropriate, considering the institution’s capacity and the need and availability of such opportunities for community development in the institution’s AA.

As noted earlier, UB became an Intermediate Small Bank for CRA on January 1, 2021, and this is UB’s first CRA evaluation including the Community Development Test. UB’s management provided information on several qualified community development activities throughout the overall evaluation period, including the period prior to January 1, 2021. The following sections include this information, but examiners primarily focused on the 2021 activities in determining the overall conclusion for this test.

Community Development Loans

During the review period, UB originated 17 community development loans within the AA totaling \$1.6 million. This total reflects six community development loans totaling nearly \$1.3 million in addition to 11 loans totaling \$356,900 originated through the SBA PPP. Qualified loans originated through the PPP promoted job retention for low- and moderate-income persons and/or in low- and moderate-income census tracts. UB’s level of community development lending activity represents 0.5 percent of average total assets and 1.0 percent of average total loans.

As part of the evaluation, examiners compared UB’s performance to SSIs. SSIs for this evaluation consist of banks that are larger and operate more branches than UB. With regard to both the number and dollar volume of originations, the bank’s community development lending activity is similar to one peer institution and below the other. The following table illustrates the bank’s community development lending within the AA.

Community Development Lending										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
		\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2018	0	0	1	50	0	0	0	0	1	50
2019	0	0	1	150	1	572	0	0	2	722
2020	0	0	2	328	0	0	6	203	8	531
YTD 2021	0	0	1	178	0	0	5	154	6	332
Total	0	0	5	706	1	572	11	357	17	1,635
<i>Source: Bank Data</i>										

Notable community development loans include:

- Four loans totaling \$656,200 to a child-care organization that prepares children from low- and moderate-income households for future academic success and provides their parents with opportunities for professional, personal, and economic growth.
- \$571,500 loan for the purchase of a hardware store in Ypsilanti that is located in an

economically distressed area targeted for re-development. The business offered, among other things, essential products including personal protective equipment during the height of the pandemic, for the low- and moderate-income communities that surround it. It also provides job opportunities within those same communities.

As UB adequately met the community development needs of the AA, examiners also considered ten PPP loans totaling \$623,054 made outside its AA. These qualified PPP loans also promoted job retention for low- and moderate-income persons and/or in low- and moderate-income census tracts.

Qualified Investments

UB made 12 qualified investments and donations totaling \$3.2 million during the evaluation period. This level of activity represents 1.0 percent of average total assets and 59.6 percent of average total securities since the previous evaluation. The majority of donations support organizations that provide affordable housing and community services to low- and moderate-income individuals.

Examiners compared the bank’s activities to two SSIs. Both had a larger number of qualified investments and donations. One also had a larger number of qualified investments and donations by dollar volume. As previously stated, UB only became an Intermediate Small Bank on January 1, 2021, and presented data from this current year. The following table presents the bank’s qualified investment and donation activity.

Qualified Investments										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Investments YTD 2021	2	3,125	0	0	0	0	0	0	2	3,125
Qualified Grants & Donations YTD 2021	6	68	4	14	0	0	0	0	10	82
Total	8	3,193	4	14	0	0	0	0	12	3,207
<i>Source: Bank Data</i>										

Notable examples of qualified investments and donations include:

- Two investments totaling \$3.1 million in mortgage-backed securities comprised of loans to low- and moderate-income individuals in Washtenaw County.
- \$40,000 donation to a nonprofit organization focused on improving accessibility to affordable housing for low-income persons located in Washtenaw County.
- \$25,000 donation to an organization dedicated to providing affordable housing to low- and moderate-income individuals in Washtenaw County.

Community Development Services

During the evaluation period, 19 bank employees provided 31 instances (totaling over 325 hours) of financial expertise or technical assistance to eight different community development-related

organizations. UB’s level of community involvement was consistent with two peer institutions. The following table illustrates these activities by year and purpose.

Community Development Services					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
2016	0	2	3	0	5
2017	0	5	2	0	7
2018	0	8	2	0	10
2019	0	2	2	0	4
2020	0	1	1	0	2
YTD 2021	2	0	1	0	3
Total	2	18	11	0	31
<i>Source: Bank Data</i>					

Notable examples of the bank’s community development services include:

- During each year of the evaluation period, a bank employee served on the Board of a local economic development corporation. He previously served as the President of the corporation bringing years of banking expertise and financial knowledge.
- A bank employee provides marketing support services to an affordable housing organization serving low- and moderate-income individuals.
- During three years of the evaluation period, a bank employee served on the Board and the Loan Committee for a nonprofit SBA microloan lender. He also served as interim Treasurer for some months in 2017 and 2018.
- On several occasions during the evaluation period, bank employees provided financial literacy education to low- and moderate-income individuals through three different organizations. The organizations primarily serve foster care youth transitioning to adulthood, a homeless shelter, and a youth homeless shelter.

In addition to the services provided, the bank offers Individual Development Accounts in conjunction with the Michigan Youth Opportunities Initiatives program in Washtenaw County. The program’s mission is to improve outcomes for youths transitioning from foster care to adulthood. These no cost accounts provide a way for participants to start a banking relationship and begin saving money.

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Examiners did not identify any evidence of discriminatory or other illegal credit practices; therefore, this consideration did not affect the institution’s overall CRA rating.

APPENDICES

INTERMEDIATE SMALL BANK PERFORMANCE CRITERIA

Lending Test

The Lending Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) by considering the following criteria:

- 1) The bank's loan-to-deposit ratio, adjusted for seasonal variation, and, as appropriate, other lending-related activities, such as loan originations for sale to the secondary markets, community development loans, or qualified investments;
- 2) The percentage of loans, and as appropriate, other lending-related activities located in the bank's assessment area(s);
- 3) The geographic distribution of the bank's loans;
- 4) The bank's record of lending to and, as appropriate, engaging in other lending-related activities for borrowers of different income levels and businesses and farms of different sizes; and
- 5) The bank's record of taking action, if warranted, in response to written complaints about its performance in helping to meet credit needs in its assessment area(s).

Community Development Test

The Community Development Test considers the following criteria:

- 1) The number and amount of community development loans;
- 2) The number and amount of qualified investments;
- 3) The extent to which the bank provides community development services; and
- 4) The bank's responsiveness through such activities to community development lending, investment, and service needs.

GLOSSARY

Aggregate Lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

American Community Survey (ACS): A nationwide United States Census survey that produces demographic, social, housing, and economic estimates in the form of five year estimates based on population thresholds.

Area Median Income: The median family income for the MSA, if a person or geography is located in an MSA; or the statewide nonmetropolitan median family income, if a person or geography is located outside an MSA.

Assessment Area: A geographic area delineated by the bank under the requirements of the Community Reinvestment Act.

Census Tract: A small, relatively permanent statistical subdivision of a county or equivalent entity. The primary purpose of census tracts is to provide a stable set of geographic units for the presentation of statistical data. Census tracts generally have a population size between 1,200 and 8,000 people, with an optimum size of 4,000 people. Census tract boundaries generally follow visible and identifiable features, but they may follow nonvisible legal boundaries in some instances. State and county boundaries always are census tract boundaries.

Combined Statistical Area (CSA): A combination of several adjacent metropolitan statistical areas or micropolitan statistical areas or a mix of the two, which are linked by economic ties.

Community Development: For loans, investments, and services to qualify as community development activities, their primary purpose must:

- (1) Support affordable housing for low- and moderate-income individuals;
- (2) Target community services toward low- and moderate-income individuals;
- (3) Promote economic development by financing small businesses or farms; or
- (4) Provide activities that revitalize or stabilize low- and moderate-income geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies.

Community Development Corporation (CDC): A CDC allows banks and holding companies to make equity type of investments in community development projects. Institution CDCs can develop innovative debt instruments or provide near-equity investments tailored to the development needs of the community. Institution CDCs are also tailored to their financial and marketing needs. A CDC may purchase, own, rehabilitate, construct, manage, and sell real property. Also, it may make equity or debt investments in development projects and in local businesses. The CDC activities are expected to directly benefit low- and moderate-income groups, and the investment dollars should not represent an undue risk on the banking organization.

Community Development Financial Institutions (CDFIs): CDFIs are private intermediaries (either for profit or nonprofit) with community development as their primary mission. A CDFI facilitates the flow of lending and investment capital into distressed communities and to individuals who have been unable to take advantage of the services offered by traditional financial institutions. Some basic types of CDFIs include community development banks, community development loan funds, community development credit unions, micro enterprise funds, and community development venture capital funds.

A certified CDFI must meet eligibility requirements. These requirements include the following:

- Having a primary mission of promoting community development;
- Serving an investment area or target population;
- Providing development services;
- Maintaining accountability to residents of its investment area or targeted population through representation on its governing board of directors, or by other means;
- Not constituting an agency or instrumentality of the United States, of any state or political subdivision of a state.

Community Development Loan: A loan that:

- (1) Has as its primary purpose community development; and
- (2) Except in the case of a wholesale or limited purpose institution:
 - (i) Has not been reported or collected by the institution or an affiliate for consideration in the institution's assessment area as a home mortgage, small business, small farm, or consumer loan, unless it is a multifamily dwelling loan (as described in Appendix A to Part 203 of this title); and
 - (ii) Benefits the institution's assessment area(s) or a broader statewide or regional area including the institution's assessment area(s).

Community Development Service: A service that:

- (1) Has as its primary purpose community development;
- (2) Is related to the provision of financial services; and
- (3) Has not been considered in the evaluation of the institution's retail banking services under § 345.24(d).

Consumer Loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

Core Based Statistical Area (CBSA): The county or counties or equivalent entities associated with at least one core (urbanized area or urban cluster) of at least 10,000 population, plus adjacent counties having a high degree of social and economic integration with the core as measured through commuting ties with the counties associated with the core. Metropolitan and Micropolitan Statistical Areas are the two categories of CBSAs.

Distressed Middle-Income Nonmetropolitan Geographies: A nonmetropolitan middle-income geography will be designated as distressed if it is in a county that meets one or more of the following triggers:

- (1) An unemployment rate of at least 1.5 times the national average;
- (2) A poverty rate of 20 percent or more; or
- (3) A population loss of 10 percent or more between the previous and most recent decennial census or a net migration loss of 5 percent or more over the 5-year period preceding the most recent census.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family. Other family is further classified into “male householder” (a family with a male householder and no wife present) or “female householder” (a family with a female householder and no husband present).

FFIEC-Estimated Income Data: The Federal Financial Institutions Examination Council (FFIEC) issues annual estimates which update median family income from the metropolitan and nonmetropolitan areas. The FFIEC uses American Community Survey data and factors in information from other sources to arrive at an annual estimate that more closely reflects current economic conditions.

Full-Scope Review: A full-scope review is accomplished when examiners complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is analyzed considering performance context, quantitative factors (e.g, geographic distribution, borrower profile, and total number and dollar amount of investments), and qualitative factors (e.g, innovativeness, complexity, and responsiveness).

Geography: A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants; the amount of loan requested; and the disposition of the application (approved, denied, and withdrawn).

Home Mortgage Loans: Includes closed-end mortgage loans or open-end line of credits as defined in the HMDA regulation that are not an excluded transaction per the HMDA regulation.

Housing Unit: Includes a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied as separate living quarters.

Limited-Scope Review: A limited scope review is accomplished when examiners do not complete all applicable interagency examination procedures for an assessment area.

Performance under applicable tests is often analyzed using only quantitative factors (e.g, geographic distribution, borrower profile, total number and dollar amount of investments, and branch distribution).

Low-Income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent in the case of a geography.

Low Income Housing Tax Credit: The Low-Income Housing Tax Credit Program is a housing program contained within the Internal Revenue Code of 1986, as amended. It is administered by the U.S. Department of the Treasury and the Internal Revenue Service. The U.S. Treasury Department distributes low-income housing tax credits to housing credit agencies through the Internal Revenue Service. The housing agencies allocate tax credits on a competitive basis.

Developers who acquire, rehabilitate, or construct low-income rental housing may keep their tax credits. Or, they may sell them to corporations or investor groups, who, as owners of these properties, will be able to reduce their own federal tax payments. The credit can be claimed annually for ten consecutive years. For a project to be eligible, the developer must set aside a specific percentage of units for occupancy by low-income residents. The set-aside requirement remains throughout the compliance period, usually 30 years.

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

Median Income: The median income divides the income distribution into two equal parts, one having incomes above the median and other having incomes below the median.

Metropolitan Division (MD): A county or group of counties within a CBSA that contain(s) an urbanized area with a population of at least 2.5 million. A MD is one or more main/secondary counties representing an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area (MSA): CBSA associated with at least one urbanized area having a population of at least 50,000. The MSA comprises the central county or counties or equivalent entities containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

Middle-Income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 and less than 120 percent in the case of a geography.

Moderate-Income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 and less than 80 percent in the case of a geography.

Multi-family: Refers to a residential structure that contains five or more units.

Nonmetropolitan Area (also known as **non-MSA**): All areas outside of metropolitan areas. The definition of nonmetropolitan area is not consistent with the definition of rural areas. Urban and rural classifications cut across the other hierarchies. For example, there is generally urban and rural territory within metropolitan and nonmetropolitan areas.

Owner-Occupied Units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified Investment: A lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rated Area: A rated area is a state or multistate metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multistate metropolitan area, the institution will receive a rating for the multistate metropolitan area.

Rural Area: Territories, populations, and housing units that are not classified as urban.

Small Business Investment Company (SBIC): SBICs are privately-owned investment companies which are licensed and regulated by the Small Business Administration (SBA). SBICs provide long-term loans and/or venture capital to small firms. Because money for venture or risk investments is difficult for small firms to obtain, SBA provides assistance to SBICs to stimulate and supplement the flow of private equity and long-term loan funds to small companies. Venture capitalists participate in the SBIC program to supplement their own private capital with funds borrowed at favorable rates through SBA's guarantee of SBIC debentures. These SBIC debentures are then sold to private investors. An SBIC's success is linked to the growth and profitability of the companies that it finances. Therefore, some SBICs primarily assist businesses with significant growth potential, such as new firms in innovative industries. SBICs finance small firms by providing straight loans and/or equity-type investments. This kind of financing gives them partial ownership of those businesses and the possibility of sharing in the companies' profits as they grow and prosper.

Small Business Loan: A loan included in "loans to small businesses" as defined in the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$1 million or less and are either secured by nonfarm nonresidential properties or are classified as commercial and industrial loans.

Small Farm Loan: A loan included in "loans to small farms" as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, including farm residential and other improvements, or are classified as loans to finance agricultural production and other loans to farmers.

Underserved Middle-Income Nonmetropolitan Geographies: A nonmetropolitan middle-income geography will be designated as underserved if it meets criteria for population size, density, and dispersion indicating the area's population is sufficiently small, thin, and distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs.

Upper-Income: Individual income that is 120 percent or more of the area median income, or a median family income that is 120 percent or more in the case of a geography.

Urban Area: All territories, populations, and housing units in urbanized areas and in places of 2,500 or more persons outside urbanized areas. More specifically, "urban" consists of territory, persons, and housing units in places of 2,500 or more persons incorporated as cities, villages, boroughs (except in Alaska and New York), and towns (except in the New England states, New York, and Wisconsin).

"Urban" excludes the rural portions of "extended cities"; census designated place of 2,500 or more persons; and other territory, incorporated or unincorporated, including in urbanized areas.

SECTION D

BANKING CENTERS, ATM's, LPO's

BANKING CENTERS, ATM'S, LPO's

TYPE	ADDRESS	COUNTY	MSA
BANKING CENTER	2015 Washtenaw Ave Ann Arbor, MI 48104	Washtenaw	ANN ARBOR - 11460
ATM	300 S State Street Ann Arbor, MI 48104	Washtenaw	ANN ARBOR - 11460
ATM	2460 Washtenaw Ave Ann Arbor, MI 48104	Washtenaw	ANN ARBOR – 11460
ATM	301 W Michigan Ave Ypsilanti, MI 48197	Washtenaw	ANN ARBOR - 11460
LPO	301 W Michigan Ave Ypsilanti, MI 48197	Washtenaw	ANN ARBOR - 11460

SECTION E

BRANCH HOURS OF OPERATION & OPEN/CLOSED REPORT

BRANCH HOURS OF OPERATION & OPEN/CLOSED REPORT

TYPE	ADDRESS	Hours of Operation	Open/Closed
BANKING CENTER	2015 Washtenaw Ave Ann Arbor, MI 48104	Monday – 9am to 5pm Tuesday – 9am to 5pm Wednesday – 9am to 5pm Thursday – 9am to 5pm Friday – 9am to 5pm Saturday – Closed Sunday – Closed	
ATM	300 S State Street Ann Arbor, MI 48104	Open 24 Hours	
ATM	2460 Washtenaw Ave Ann Arbor, MI 48104	Drive-Thru Open 24 Hours	
ATM	301 W Michigan Ave Ypsilanti, MI 48197	Drive-Thru Open 24 Hours	
LPO	301 W Michigan Ave Ypsilanti, MI 48197	Monday – 9am to 5pm Tuesday – 9am to 5pm Wednesday – 9am to 5pm Thursday – 9am to 5pm Friday – 9am to 5pm Saturday – Closed Sunday – Closed	Open August 2021

SECTION F
PRODUCTS AND SERVICES

PRODUCTS AND SERVICES

Product	Description
<i>Personal Accounts</i>	
University Checking	<ul style="list-style-type: none"> • Minimum opening balance \$100 • No minimum monthly balance • No monthly service charges • Unlimited check writing • Accessible by ATM or MasterCard® Debit Card
University Checking Plus	<ul style="list-style-type: none"> • Minimum opening balance \$500 • Monthly service charge – may apply if avg. daily balance falls below \$500 • Interest-bearing account • Unlimited check writing • Accessible by ATM or MasterCard® Debit Card
University Money Market	<ul style="list-style-type: none"> • Minimum opening balance \$2,500 • Monthly service charge – may apply if avg. daily balance falls below \$2,500 • Tiered interest rates • Unrestricted withdrawal access • Accessible by ATM or MasterCard® Debit Card
University Savings	<ul style="list-style-type: none"> • Minimum opening balance \$25 • No minimum monthly balance • No monthly service charges • Interest-bearing account • Accessible by ATM Card
<i>Business Accounts</i>	
University Small Business Checking	<ul style="list-style-type: none"> • Minimum opening balance \$500 • Monthly service charge – may apply if avg. daily balance falls below \$500 • Unlimited deposits • Accessible by ATM or Business MasterCard® Debit Card
University Business Checking Plus	<ul style="list-style-type: none"> • Minimum opening balance \$1,000 • Monthly service charge – may apply if avg. daily balance falls below \$1,000 • Interest-bearing account • Accessible by ATM or Business MasterCard® Debit Card

<p>University Business Money Market</p>	<ul style="list-style-type: none"> • Minimum opening balance \$2,500 • Monthly service charge – may apply if avg. daily balance falls below \$2,500 • Tiered interest rates • Accessible by ATM or Business MasterCard® Debit Card
<p><i>Consumer Lending</i></p>	
<p>Closed-end Home Equity Loan</p>	<ul style="list-style-type: none"> • Typically, 15-year term with principal and interest payment throughout the term • Fees are cost of title, flood, credit report & AVM plus an origination fee of up to \$995.00 depending on loan amount • Rates are Fixed and dependent upon credit score.
<p>Home Equity LOC's</p>	<ul style="list-style-type: none"> • 15-year term with a 5-year draw period and a 10-year repayment • Interest only payments during draw period and principal and interest during the repayment period • Fees are cost of title, flood, credit report & AVM plus an origination fee of \$250 <p>*Rates are based on score: For 740 and above, Rate=P+1%; for 700-739, Rate=P+2%; and for 660-699, Rate=P+3%.</p>
<p>Bridge Loan</p>	<ul style="list-style-type: none"> • Typically set up as 6-month temporary financing. Used typically to pull out equity from an existing home to purchase another home. • Interest-only payments (interest rate depends on credit score)* • Fees are cost of title, flood, credit report & AVM plus an origination fee of 1% of the loan amount <p>*Rates are based on score: For 740 and above, Rate=P+1%; for 700-739, Rate=P+2%; and for 660-699, Rate=P+3%.</p>
<p>Miscellaneous Products</p>	<ul style="list-style-type: none"> • Automobile Loans • Recreational Vehicles (Boats, Motorcycles, RV's etc.) • Personal Loans • Credit Cards (Visa®)
<p><i>Certificate of Deposits</i></p>	
<p>Certificate of Deposit Accounts</p>	<ul style="list-style-type: none"> • Terms from 12 months up to 60 months • \$1,000 minimum opening balance. • Fixed rate for the term • May receive interest by check, transfer or compounding • 10 calendar day grace period at maturity
<p>Business Manager</p>	<p>Benefits</p>

	<p>Improve cash flow With a more predictable cash flow, you can make payroll, remit payables on time, increase inventory, and pursue new business opportunities.</p> <p>Save time and money Take advantage of prompt payment discounts from suppliers and get back to doing business. Sending files electronically allows you to redirect personnel to more productive tasks.</p> <p>Manage your business Track receivables with detailed reports, reduce your debt, maintain a liquid working capital position, and prevail in seasonal fluctuations.</p> <p>Improve collections You can choose to use the Bank's presence on customer correspondence, which influences customers to pay on time.</p> <p>Offer financing options to your customers Sharpen your competitive edge by offering flexible payment terms. You win and your customers do too.</p>
<p style="text-align: center;">SBA 7(a) Program</p>	<ul style="list-style-type: none"> • Loan Amounts \$250,000 – \$5,000,000 • Borrower investment/down payment is 10-25% of purchase price • Working Capital – Up to 7 years • Equipment Loans – Up to 15 years • Real Estate – Up to 25 years • Purchase land or buildings, to cover new construction as well as expansion or conversion of existing facilities • Acquire equipment, machinery, furniture, fixtures, supplies, or materials • Obtain long-term working capital including the payment of accounts payable and/or the purchase of inventory • Refinance existing business indebtedness, which is not already structured with reasonable terms and conditions • Longer maturity terms than a conventional loan • Same application process as a conventional loan • Easier to qualify than conventional loans • Lower down payments on fixed assets • SBA fees can be financed into the loan
<p style="text-align: center;">SBA 504 Program</p>	<ul style="list-style-type: none"> • No bank minimum limit on total project cost • Minimum equity infusion of 10% (15% for start-ups or single purpose real estate and 20% if both conditions apply) • University Bank will provide a conventional mortgage with first lien position • A Certified Development Corporation (CDC) will partner in the financing with a second mortgage for 30% to 40% of the total project cost that is fully guaranteed by the SBA. Maximum SBA portion is \$1.5 million / \$2 million in special

	<p>cases and \$4 million for manufacturers. The CDC's fee is 2.75% plus attorney's fees.</p> <ul style="list-style-type: none"> • Businesses qualify if they do not have a tangible net worth in excess of \$2.5 million after taxes for the proceeding two years • 51% owner occupancy required: new construction 60% owner occupancy • University Bank must approve interim financing for the SBA portion because of the SBA debenture funding process • Prepayment penalty may apply • Bank Portion – minimum 7 years for equipment or 10 years for Real Estate • SBA portion – minimum 10 years for equipment or 20 years for Real Estate • Real estate financing (land and building) • Construction and improvements • Heavy machinery • Lower down payments on real estate acquisition • Same application process as a conventional loan • Favorable terms and pricing on SBA debenture • Business conserves capital • Fees can be included in the total project cost
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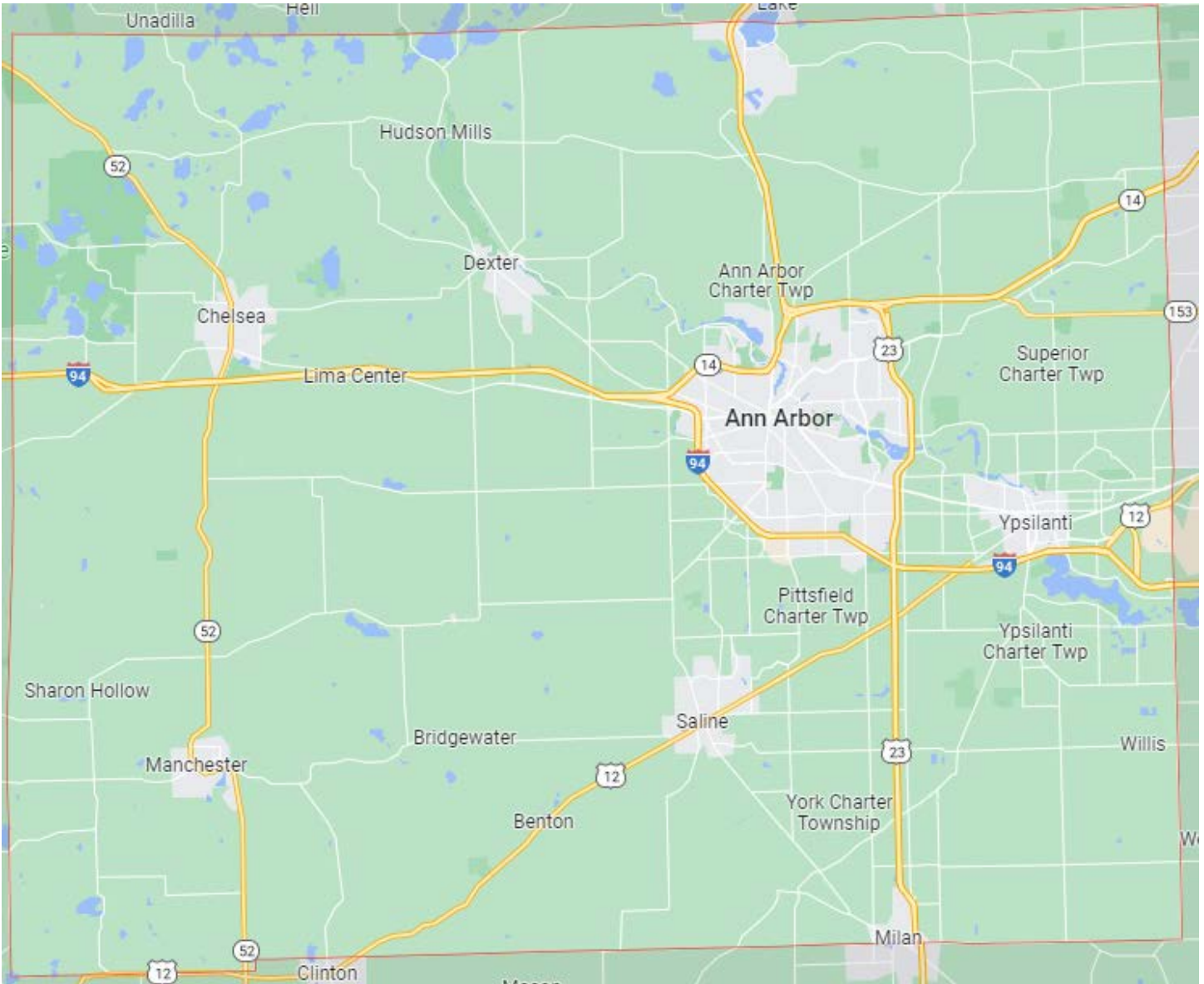
FEE SCHEDULE

FEE ITEM	FEE AMOUNT
Account Balance Research	\$20.00 per hour
Cashier's Check	\$3.00
Close Account (within 180 days)	\$10.00
Counter Check	\$1.00
Deposited Checks Returned Unpaid	\$5.00
Dormant Account Fee after 24 months	\$2.00 charged monthly
Duplicate Check or Statement Copy	\$5.00
Non-Sufficient/Uncollected Funds (NSF)	\$27.00
Negative Balance Transfer Fee	\$5.00 per transfer
Replacement ATM/Debit Card	\$3.00
Stop Payment	\$25.00
Wire Transfer	\$15.00 - \$50.00

SECTION G
ASSESSMENT AREA

ASSESSMENT AREA

ANN ARBOR MSA - 11460



2023 FFIEC Census Report - Summary Census Demographic Information

MSA/MD: 11460 - ANN ARBOR, MI

State: 26 - MICHIGAN (MI)



State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2023 FFIEC Est.MSA/MD non-MSA/MD Median Family Income	2023 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
26	161	4001.00	Upper	No	141.76	\$124,000	\$175,782	\$149,167	1958	41.01	803	239	80
26	161	4003.00	Unknown	No	0.00	\$124,000	\$0	\$0	4212	33.81	1424	186	406
26	161	4004.00	Upper	No	160.13	\$124,000	\$198,561	\$168,500	3014	17.65	532	890	1110
26	161	4005.00	Unknown	No	0.00	\$124,000	\$0	\$0	7235	30.08	2176	67	1306
26	161	4006.00	Upper	No	122.65	\$124,000	\$152,086	\$129,067	5090	24.50	1247	881	1469
26	161	4007.00	Upper	No	144.85	\$124,000	\$179,614	\$152,422	2569	25.50	655	424	1070
26	161	4008.00	Unknown	No	0.00	\$124,000	\$0	\$0	3410	36.86	1257	55	475
26	161	4021.00	Middle	No	90.34	\$124,000	\$112,022	\$95,063	2917	38.84	1133	417	688
26	161	4022.01	Low	No	43.26	\$124,000	\$53,642	\$45,521	5503	42.79	2355	34	89
26	161	4023.00	Upper	No	147.30	\$124,000	\$182,652	\$155,000	2813	31.89	897	963	874
26	161	4025.00	Upper	No	120.97	\$124,000	\$150,003	\$127,292	2311	46.99	1086	468	467
26	161	4026.01	Moderate	No	60.10	\$124,000	\$74,524	\$63,250	4091	46.17	1889	131	453
26	161	4027.00	Upper	No	133.94	\$124,000	\$166,086	\$140,947	5396	43.16	2329	1318	2070
26	161	4031.00	Upper	No	237.58	\$124,000	\$294,599	\$250,001	1542	22.05	340	565	605
26	161	4032.00	Upper	No	133.76	\$124,000	\$165,862	\$140,750	3369	21.99	741	983	1377
26	161	4033.00	Middle	No	104.38	\$124,000	\$129,431	\$109,836	4220	25.52	1077	1153	1498
26	161	4034.00	Upper	No	148.53	\$124,000	\$184,177	\$156,293	3114	16.86	525	1070	1306
26	161	4035.00	Middle	No	95.62	\$124,000	\$118,569	\$100,625	3026	21.74	658	670	1133
26	161	4036.00	Middle	No	90.39	\$124,000	\$112,084	\$95,121	5818	61.09	3554	697	1263
26	161	4038.00	Middle	No	81.22	\$124,000	\$100,713	\$85,469	3153	45.26	1427	872	1200
26	161	4041.00	Upper	No	137.20	\$124,000	\$170,128	\$144,375	3069	19.84	609	914	1139
26	161	4042.00	Low	No	37.77	\$124,000	\$46,835	\$39,750	1983	42.97	852	363	381
26	161	4043.00	Upper	No	126.58	\$124,000	\$156,959	\$133,196	2696	17.06	460	1132	1176
26	161	4044.00	Upper	No	167.42	\$124,000	\$207,601	\$176,167	2275	22.81	519	693	837
26	161	4045.00	Moderate	No	63.06	\$124,000	\$78,194	\$66,364	4421	42.00	1857	288	418
26	161	4046.00	Middle	No	103.52	\$124,000	\$128,365	\$108,934	4751	30.92	1469	1196	1803

* Will automatically be included in the 2024 Distressed or Underserved Tract List

State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2023 FFIEC Est.MSA/MD non-MSA/MD Median Family Income	2023 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
26	161	4051.00	Moderate	No	57.52	\$124,000	\$71,325	\$60,526	2264	39.66	898	451	821
26	161	4052.00	Upper	No	123.42	\$124,000	\$153,041	\$129,872	4897	27.28	1336	1358	1717
26	161	4053.00	Upper	No	208.26	\$124,000	\$258,242	\$219,148	5133	25.48	1308	1705	1825
26	161	4054.00	Middle	No	118.49	\$124,000	\$146,928	\$124,683	2048	23.44	480	856	989
26	161	4055.00	Middle	No	80.60	\$124,000	\$99,944	\$84,821	2365	44.61	1055	849	1044
26	161	4056.00	Low	No	44.17	\$124,000	\$54,771	\$46,484	4544	56.23	2555	296	1256
26	161	4060.00	Upper	No	174.28	\$124,000	\$216,107	\$183,393	3673	37.57	1380	881	1103
26	161	4070.00	Upper	No	187.39	\$124,000	\$232,364	\$197,188	5215	26.42	1378	1663	1868
26	161	4074.00	Low	No	44.68	\$124,000	\$55,403	\$47,015	6466	63.90	4132	1507	1958
26	161	4076.00	Middle	No	106.32	\$124,000	\$131,837	\$111,875	3151	49.25	1552	1162	1226
26	161	4101.00	Low	No	31.21	\$124,000	\$38,700	\$32,844	3306	64.46	2131	21	105
26	161	4102.00	Middle	No	90.75	\$124,000	\$112,530	\$95,500	3145	32.59	1025	481	550
26	161	4103.00	Middle	No	80.09	\$124,000	\$99,312	\$84,276	3871	27.85	1078	878	1467
26	161	4104.00	Middle	No	84.43	\$124,000	\$104,693	\$88,848	3584	37.92	1359	1041	1137
26	161	4105.00	Low	No	42.34	\$124,000	\$52,502	\$44,561	2153	55.83	1202	342	516
26	161	4106.00	Low	No	17.69	\$124,000	\$21,936	\$18,615	3007	71.93	2163	361	976
26	161	4107.00	Low	No	46.43	\$124,000	\$57,573	\$48,864	1454	52.89	769	231	566
26	161	4108.00	Low	No	43.95	\$124,000	\$54,498	\$46,250	1711	43.54	745	240	484
26	161	4109.00	Middle	No	86.84	\$124,000	\$107,682	\$91,382	1433	19.54	280	491	600
26	161	4110.00	Low	No	47.33	\$124,000	\$58,689	\$49,806	2490	35.14	875	105	487
26	161	4112.00	Low	No	26.57	\$124,000	\$32,947	\$27,965	2665	72.01	1919	10	151
26	161	4117.00	Moderate	No	77.73	\$124,000	\$96,385	\$81,800	2331	36.94	861	866	963
26	161	4119.00	Moderate	No	50.98	\$124,000	\$63,215	\$53,648	3743	46.33	1734	527	999
26	161	4120.00	Moderate	No	51.67	\$124,000	\$64,071	\$54,375	3728	41.20	1536	863	1282
26	161	4121.00	Moderate	No	67.65	\$124,000	\$83,886	\$71,185	3732	46.17	1723	984	1297
26	161	4123.00	Low	No	40.71	\$124,000	\$50,480	\$42,841	2990	76.82	2297	632	1125
26	161	4126.00	Moderate	No	67.08	\$124,000	\$83,179	\$70,585	2602	36.74	956	229	244
26	161	4127.00	Middle	No	89.83	\$124,000	\$111,389	\$94,527	4983	46.22	2303	1086	1277
26	161	4130.00	Moderate	No	59.56	\$124,000	\$73,854	\$62,679	3635	51.69	1879	838	1328

* Will automatically be included in the 2024 Distressed or Underserved Tract List

State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2023 FFIEC Est.MSA/MD non-MSA/MD Median Family Income	2023 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
26	161	4132.00	Middle	No	83.34	\$124,000	\$103,342	\$87,697	5190	43.37	2251	1106	1615
26	161	4134.01	Middle	No	110.29	\$124,000	\$136,760	\$116,056	4607	47.04	2167	1438	1553
26	161	4134.02	Middle	No	96.39	\$124,000	\$119,524	\$101,429	5586	43.77	2445	1666	1780
26	161	4134.03	Middle	No	90.09	\$124,000	\$111,712	\$94,799	1962	27.93	548	766	830
26	161	4140.00	Low	No	46.24	\$124,000	\$57,338	\$48,657	3193	60.57	1934	10	105
26	161	4142.00	Moderate	No	76.60	\$124,000	\$94,984	\$80,610	2930	44.44	1302	567	736
26	161	4143.00	Middle	No	92.58	\$124,000	\$114,799	\$97,417	3025	58.05	1756	416	620
26	161	4145.00	Upper	No	125.83	\$124,000	\$156,029	\$132,404	3073	46.73	1436	983	1040
26	161	4147.00	Middle	No	112.40	\$124,000	\$139,376	\$118,281	1584	32.26	511	495	607
26	161	4149.00	Upper	No	149.68	\$124,000	\$185,603	\$157,500	3704	47.73	1768	1114	1249
26	161	4152.00	Moderate	No	76.27	\$124,000	\$94,575	\$80,257	2407	44.12	1062	135	296
26	161	4154.00	Middle	No	86.61	\$124,000	\$107,396	\$91,136	2123	33.58	713	608	510
26	161	4156.00	Upper	No	179.97	\$124,000	\$223,163	\$189,375	2594	24.71	641	620	635
26	161	4158.00	Upper	No	176.47	\$124,000	\$218,823	\$185,694	3608	29.85	1077	1350	1383
26	161	4160.00	Middle	No	101.21	\$124,000	\$125,500	\$106,500	3686	49.95	1841	1210	1300
26	161	4162.00	Upper	No	128.34	\$124,000	\$159,142	\$135,046	5169	22.15	1145	1603	1677
26	161	4200.00	Middle	No	99.02	\$124,000	\$122,785	\$104,200	3745	22.64	848	1149	1250
26	161	4202.00	Middle	No	105.33	\$124,000	\$130,609	\$110,833	3338	16.81	561	1135	1268
26	161	4211.00	Moderate	No	77.65	\$124,000	\$96,286	\$81,711	3865	14.36	555	1089	1567
26	161	4222.01	Upper	No	142.37	\$124,000	\$176,539	\$149,813	3582	12.56	450	1086	1228
26	161	4222.02	Middle	No	96.66	\$124,000	\$119,858	\$101,711	3923	17.95	704	1363	1542
26	161	4234.00	Middle	No	92.15	\$124,000	\$114,266	\$96,974	6368	13.36	851	2245	2484
26	161	4236.00	Middle	No	103.00	\$124,000	\$127,720	\$108,382	2606	14.81	386	605	759
26	161	4250.00	Upper	No	145.16	\$124,000	\$179,998	\$152,750	4380	21.58	945	1553	1715
26	161	4260.01	Middle	No	92.26	\$124,000	\$114,402	\$97,083	2252	11.90	268	750	820
26	161	4260.02	Middle	No	109.43	\$124,000	\$135,693	\$115,156	2036	17.19	350	682	723
26	161	4310.00	Middle	No	90.75	\$124,000	\$112,530	\$95,500	4626	8.69	402	1763	2141
26	161	4320.00	Middle	No	93.38	\$124,000	\$115,791	\$98,265	4764	7.83	373	1733	2047

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State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2023 FFIEC Est.MSA/MD non-MSA/MD Median Family Income	2023 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
26	161	4440.00	Upper	No	121.50	\$124,000	\$150,660	\$127,853	6696	8.89	595	2230	2572
26	161	4450.00	Middle	No	106.36	\$124,000	\$131,886	\$111,923	2656	11.60	308	985	1250
26	161	4462.00	Middle	No	108.20	\$124,000	\$134,168	\$113,854	2252	9.15	206	649	928
26	161	4464.00	Upper	No	131.24	\$124,000	\$162,738	\$138,098	3215	9.98	321	1003	1148
26	161	4470.00	Middle	No	83.61	\$124,000	\$103,676	\$87,981	3311	10.63	352	1097	1282
26	161	4480.00	Middle	No	103.91	\$124,000	\$128,848	\$109,345	4024	11.93	480	1269	1550
26	161	4530.00	Upper	No	157.04	\$124,000	\$194,730	\$165,250	5212	17.38	906	1897	2100
26	161	4540.01	Upper	No	123.28	\$124,000	\$152,867	\$129,722	1257	9.15	115	416	450
26	161	4540.02	Middle	No	84.74	\$124,000	\$105,078	\$89,167	3719	12.85	478	1051	1243
26	161	4550.00	Middle	No	107.02	\$124,000	\$132,705	\$112,612	5072	33.71	1710	1332	1773
26	161	4560.00	Upper	No	174.69	\$124,000	\$216,616	\$183,826	5914	36.03	2131	1863	2013
26	161	4610.00	Upper	No	152.35	\$124,000	\$188,914	\$160,313	7371	10.20	752	2733	3023
26	161	4640.00	Middle	No	105.75	\$124,000	\$131,130	\$111,276	7018	14.06	987	1781	2337
26	161	4650.01	Moderate	No	60.81	\$124,000	\$75,404	\$63,990	2136	11.56	247	638	871
26	161	4650.02	Middle	No	88.02	\$124,000	\$109,145	\$92,619	3810	12.26	467	1274	1649
26	161	4660.00	Middle	No	106.28	\$124,000	\$131,787	\$111,833	2604	10.56	275	842	980
26	161	9801.01	Unknown	No	0.00	\$124,000	\$0	\$0	6052	35.03	2120	0	67
26	161	9801.02	Unknown	No	0.00	\$124,000	\$0	\$0	3713	25.07	931	0	57
26	161	9802.00	Unknown	No	0.00	\$124,000	\$0	\$0	0	0.00	0	0	0
26	161	9803.00	Unknown	No	0.00	\$124,000	\$0	\$0	2012	42.54	856	0	0
26	161	9804.00	Unknown	No	0.00	\$124,000	\$0	\$0	0	0.00	0	0	0
26	161	9805.00	Unknown	No	0.00	\$124,000	\$0	\$0	2376	29.80	708	0	0
26	161	9806.00	Unknown	No	0.00	\$124,000	\$0	\$0	1603	62.51	1002	0	9
26	161	9840.00	Unknown	No	0.00	\$124,000	\$0	\$0	34	61.76	21	15	15

* Will automatically be included in the 2024 Distressed or Underserved Tract List

2023 FFIEC Census Report - Summary Census Income Information

MSA/MD: 11460 - ANN ARBOR, MI

State: 26 - MICHIGAN (MI)



State Code	County Code	Tract Code	Tract Income Level	2020 MSA/MD Statewide non-MSA/MD Median Family Income	2023 FFIEC Est. MSA/MD non-MSA/MD Median Family Income	% Below Poverty Line	Tract Median Family Income %	2020 Tract Median Family Income	2023 Est. Tract Median Family Income	2020 Tract Median Household Income
26	161	4001.00	Upper	\$105,224	\$124,000	48.71	141.76	\$149,167	\$175,782	\$29,079
26	161	4003.00	Unknown	\$105,224	\$124,000	62.27	0.00	\$0	\$0	\$31,154
26	161	4004.00	Upper	\$105,224	\$124,000	18.14	160.13	\$168,500	\$198,561	\$123,889
26	161	4005.00	Unknown	\$105,224	\$124,000	66.46	0.00	\$0	\$0	\$27,308
26	161	4006.00	Upper	\$105,224	\$124,000	17.36	122.65	\$129,067	\$152,086	\$74,097
26	161	4007.00	Upper	\$105,224	\$124,000	37.79	144.85	\$152,422	\$179,614	\$58,438
26	161	4008.00	Unknown	\$105,224	\$124,000	62.09	0.00	\$0	\$0	\$31,667
26	161	4021.00	Middle	\$105,224	\$124,000	24.44	90.34	\$95,063	\$112,022	\$54,052
26	161	4022.01	Low	\$105,224	\$124,000	67.60	43.26	\$45,521	\$53,642	\$17,935
26	161	4023.00	Upper	\$105,224	\$124,000	1.72	147.30	\$155,000	\$182,652	\$112,759
26	161	4025.00	Upper	\$105,224	\$124,000	9.36	120.97	\$127,292	\$150,003	\$71,000
26	161	4026.01	Moderate	\$105,224	\$124,000	35.56	60.10	\$63,250	\$74,524	\$49,922
26	161	4027.00	Upper	\$105,224	\$124,000	8.92	133.94	\$140,947	\$166,086	\$122,517
26	161	4031.00	Upper	\$105,224	\$124,000	0.00	237.58	\$250,001	\$294,599	\$218,750
26	161	4032.00	Upper	\$105,224	\$124,000	10.28	133.76	\$140,750	\$165,862	\$110,200
26	161	4033.00	Middle	\$105,224	\$124,000	8.30	104.38	\$109,836	\$129,431	\$92,768
26	161	4034.00	Upper	\$105,224	\$124,000	1.78	148.53	\$156,293	\$184,177	\$109,236
26	161	4035.00	Middle	\$105,224	\$124,000	4.46	95.62	\$100,625	\$118,569	\$82,708
26	161	4036.00	Middle	\$105,224	\$124,000	28.52	90.39	\$95,121	\$112,084	\$61,609
26	161	4038.00	Middle	\$105,224	\$124,000	12.37	81.22	\$85,469	\$100,713	\$68,577
26	161	4041.00	Upper	\$105,224	\$124,000	7.36	137.20	\$144,375	\$170,128	\$94,792
26	161	4042.00	Low	\$105,224	\$124,000	17.48	37.77	\$39,750	\$46,835	\$45,250
26	161	4043.00	Upper	\$105,224	\$124,000	1.49	126.58	\$133,196	\$156,959	\$115,556
26	161	4044.00	Upper	\$105,224	\$124,000	1.10	167.42	\$176,167	\$207,601	\$147,361
26	161	4045.00	Moderate	\$105,224	\$124,000	18.14	63.06	\$66,364	\$78,194	\$65,594
26	161	4046.00	Middle	\$105,224	\$124,000	10.45	103.52	\$108,934	\$128,365	\$66,812
26	161	4051.00	Moderate	\$105,224	\$124,000	27.96	57.52	\$60,526	\$71,325	\$48,030
26	161	4052.00	Upper	\$105,224	\$124,000	6.25	123.42	\$129,872	\$153,041	\$87,345
26	161	4053.00	Upper	\$105,224	\$124,000	4.45	208.26	\$219,148	\$258,242	\$198,684
26	161	4054.00	Middle	\$105,224	\$124,000	9.03	118.49	\$124,683	\$146,928	\$63,597
26	161	4055.00	Middle	\$105,224	\$124,000	6.81	80.60	\$84,821	\$99,944	\$58,846
26	161	4056.00	Low	\$105,224	\$124,000	22.40	44.17	\$46,484	\$54,771	\$45,599
26	161	4060.00	Upper	\$105,224	\$124,000	4.67	174.28	\$183,393	\$216,107	\$114,178
26	161	4070.00	Upper	\$105,224	\$124,000	1.49	187.39	\$197,188	\$232,364	\$152,424
26	161	4074.00	Low	\$105,224	\$124,000	26.16	44.68	\$47,015	\$55,403	\$40,724
26	161	4076.00	Middle	\$105,224	\$124,000	2.39	106.32	\$111,875	\$131,837	\$95,640
26	161	4101.00	Low	\$105,224	\$124,000	24.16	31.21	\$32,844	\$38,700	\$37,122
26	161	4102.00	Middle	\$105,224	\$124,000	25.88	90.75	\$95,500	\$112,530	\$57,991
26	161	4103.00	Middle	\$105,224	\$124,000	19.21	80.09	\$84,276	\$99,312	\$52,673
26	161	4104.00	Middle	\$105,224	\$124,000	9.68	84.43	\$88,848	\$104,693	\$72,898
26	161	4105.00	Low	\$105,224	\$124,000	16.42	42.34	\$44,561	\$52,502	\$40,636

State Code	County Code	Tract Code	Tract Income Level	2020 MSA/MD Statewide non-MSA/MD Median Family Income	2023 FFIEC Est. MSA/MD non-MSA/MD Median Family Income	% Below Poverty Line	Tract Median Family Income %	2020 Tract Median Family Income	2023 Est. Tract Median Family Income	2020 Tract Median Household Income
26	161	4106.00	Low	\$105,224	\$124,000	45.08	17.69	\$18,615	\$21,936	\$26,536
26	161	4107.00	Low	\$105,224	\$124,000	23.12	46.43	\$48,864	\$57,573	\$35,823
26	161	4108.00	Low	\$105,224	\$124,000	44.80	43.95	\$46,250	\$54,498	\$31,026
26	161	4109.00	Middle	\$105,224	\$124,000	4.83	86.84	\$91,382	\$107,682	\$81,991
26	161	4110.00	Low	\$105,224	\$124,000	35.00	47.33	\$49,806	\$58,689	\$30,473
26	161	4112.00	Low	\$105,224	\$124,000	38.82	26.57	\$27,965	\$32,947	\$33,750
26	161	4117.00	Moderate	\$105,224	\$124,000	8.80	77.73	\$81,800	\$96,385	\$71,786
26	161	4119.00	Moderate	\$105,224	\$124,000	27.36	50.98	\$53,648	\$63,215	\$42,716
26	161	4120.00	Moderate	\$105,224	\$124,000	25.54	51.67	\$54,375	\$64,071	\$45,640
26	161	4121.00	Moderate	\$105,224	\$124,000	16.77	67.65	\$71,185	\$83,886	\$47,909
26	161	4123.00	Low	\$105,224	\$124,000	30.50	40.71	\$42,841	\$50,480	\$40,859
26	161	4126.00	Moderate	\$105,224	\$124,000	5.90	67.08	\$70,585	\$83,179	\$60,423
26	161	4127.00	Middle	\$105,224	\$124,000	6.03	89.83	\$94,527	\$111,389	\$69,767
26	161	4130.00	Moderate	\$105,224	\$124,000	17.58	59.56	\$62,679	\$73,854	\$50,433
26	161	4132.00	Middle	\$105,224	\$124,000	7.04	83.34	\$87,697	\$103,342	\$77,679
26	161	4134.01	Middle	\$105,224	\$124,000	2.88	110.29	\$116,056	\$136,760	\$115,135
26	161	4134.02	Middle	\$105,224	\$124,000	5.54	96.39	\$101,429	\$119,524	\$98,297
26	161	4134.03	Middle	\$105,224	\$124,000	3.98	90.09	\$94,799	\$111,712	\$96,111
26	161	4140.00	Low	\$105,224	\$124,000	19.77	46.24	\$48,657	\$57,338	\$46,979
26	161	4142.00	Moderate	\$105,224	\$124,000	14.42	76.60	\$80,610	\$94,984	\$52,342
26	161	4143.00	Middle	\$105,224	\$124,000	16.60	92.58	\$97,417	\$114,799	\$49,076
26	161	4145.00	Upper	\$105,224	\$124,000	3.37	125.83	\$132,404	\$156,029	\$121,800
26	161	4147.00	Middle	\$105,224	\$124,000	7.26	112.40	\$118,281	\$139,376	\$83,897
26	161	4149.00	Upper	\$105,224	\$124,000	3.64	149.68	\$157,500	\$185,603	\$135,757
26	161	4152.00	Moderate	\$105,224	\$124,000	10.94	76.27	\$80,257	\$94,575	\$57,717
26	161	4154.00	Middle	\$105,224	\$124,000	15.89	86.61	\$91,136	\$107,396	\$80,815
26	161	4156.00	Upper	\$105,224	\$124,000	1.12	179.97	\$189,375	\$223,163	\$186,033
26	161	4158.00	Upper	\$105,224	\$124,000	1.58	176.47	\$185,694	\$218,823	\$182,031
26	161	4160.00	Middle	\$105,224	\$124,000	11.70	101.21	\$106,500	\$125,500	\$87,708
26	161	4162.00	Upper	\$105,224	\$124,000	4.37	128.34	\$135,046	\$159,142	\$105,096
26	161	4200.00	Middle	\$105,224	\$124,000	2.83	99.02	\$104,200	\$122,785	\$91,193
26	161	4202.00	Middle	\$105,224	\$124,000	5.73	105.33	\$110,833	\$130,609	\$85,833
26	161	4211.00	Moderate	\$105,224	\$124,000	9.37	77.65	\$81,711	\$96,286	\$84,091
26	161	4222.01	Upper	\$105,224	\$124,000	2.03	142.37	\$149,813	\$176,539	\$143,873
26	161	4222.02	Middle	\$105,224	\$124,000	9.36	96.66	\$101,711	\$119,858	\$90,929
26	161	4234.00	Middle	\$105,224	\$124,000	5.53	92.15	\$96,974	\$114,266	\$78,379
26	161	4236.00	Middle	\$105,224	\$124,000	5.13	103.00	\$108,382	\$127,720	\$84,231
26	161	4250.00	Upper	\$105,224	\$124,000	1.52	145.16	\$152,750	\$179,998	\$126,141
26	161	4260.01	Middle	\$105,224	\$124,000	2.57	92.26	\$97,083	\$114,402	\$87,019
26	161	4260.02	Middle	\$105,224	\$124,000	1.49	109.43	\$115,156	\$135,693	\$112,778
26	161	4310.00	Middle	\$105,224	\$124,000	5.17	90.75	\$95,500	\$112,530	\$73,766
26	161	4320.00	Middle	\$105,224	\$124,000	4.82	93.38	\$98,265	\$115,791	\$85,824
26	161	4440.00	Upper	\$105,224	\$124,000	7.60	121.50	\$127,853	\$150,660	\$109,474
26	161	4450.00	Middle	\$105,224	\$124,000	1.64	106.36	\$111,923	\$131,886	\$107,200
26	161	4462.00	Middle	\$105,224	\$124,000	6.20	108.20	\$113,854	\$134,168	\$49,844

State Code	County Code	Tract Code	Tract Income Level	2020 MSA/MD Statewide non-MSA/MD Median Family Income	2023 FFIEC Est. MSA/MD non-MSA/MD Median Family Income	% Below Poverty Line	Tract Median Family Income %	2020 Tract Median Family Income	2023 Est. Tract Median Family Income	2020 Tract Median Household Income
26	161	4464.00	Upper	\$105,224	\$124,000	3.25	131.24	\$138,098	\$162,738	\$77,404
26	161	4470.00	Middle	\$105,224	\$124,000	2.87	83.61	\$87,981	\$103,676	\$77,667
26	161	4480.00	Middle	\$105,224	\$124,000	1.93	103.91	\$109,345	\$128,848	\$92,313
26	161	4530.00	Upper	\$105,224	\$124,000	2.30	157.04	\$165,250	\$194,730	\$141,042
26	161	4540.01	Upper	\$105,224	\$124,000	1.21	123.28	\$129,722	\$152,867	\$121,875
26	161	4540.02	Middle	\$105,224	\$124,000	4.15	84.74	\$89,167	\$105,078	\$73,819
26	161	4550.00	Middle	\$105,224	\$124,000	3.93	107.02	\$112,612	\$132,705	\$91,595
26	161	4560.00	Upper	\$105,224	\$124,000	4.02	174.69	\$183,826	\$216,616	\$150,826
26	161	4610.00	Upper	\$105,224	\$124,000	0.98	152.35	\$160,313	\$188,914	\$146,065
26	161	4640.00	Middle	\$105,224	\$124,000	6.16	105.75	\$111,276	\$131,130	\$97,222
26	161	4650.01	Moderate	\$105,224	\$124,000	19.95	60.81	\$63,990	\$75,404	\$67,526
26	161	4650.02	Middle	\$105,224	\$124,000	3.14	88.02	\$92,619	\$109,145	\$73,639
26	161	4660.00	Middle	\$105,224	\$124,000	3.72	106.28	\$111,833	\$131,787	\$96,420
26	161	9801.01	Unknown	\$105,224	\$124,000	70.62	0.00	\$0	\$0	\$31,901
26	161	9801.02	Unknown	\$105,224	\$124,000	86.03	0.00	\$0	\$0	\$0
26	161	9802.00	Unknown	\$105,224	\$124,000	0.00	0.00	\$0	\$0	\$0
26	161	9803.00	Unknown	\$105,224	\$124,000	0.00	0.00	\$0	\$0	\$0
26	161	9804.00	Unknown	\$105,224	\$124,000	0.00	0.00	\$0	\$0	\$0
26	161	9805.00	Unknown	\$105,224	\$124,000	80.00	0.00	\$0	\$0	\$0
26	161	9806.00	Unknown	\$105,224	\$124,000	0.00	0.00	\$0	\$0	\$0
26	161	9840.00	Unknown	\$105,224	\$124,000	0.00	0.00	\$0	\$0	\$0

2023 FFIEC Census Report - Summary Census Population Information

MSA/MD: 11460 - ANN ARBOR, MI

State: 26 - MICHIGAN (MI)



State Code	County Code	Tract Code	Tract Population	Tract Minority %	Number of Families	Number of Households	Non-Hisp White Population	Tract Minority Population	American Indian Population	Asian/Hawaiian/Pacific Islander Population	Black Population	Hispanic Population	Other Population/Two or More Races
26	161	4001.00	1958	41.01	160	1282	1155	803	6	529	56	108	104
26	161	4003.00	4212	33.81	202	1326	2788	1424	3	816	113	271	221
26	161	4004.00	3014	17.65	716	1210	2482	532	0	141	73	144	174
26	161	4005.00	7235	30.08	262	2553	5059	2176	9	1059	270	457	381
26	161	4006.00	5090	24.50	869	2097	3843	1247	5	426	155	358	303
26	161	4007.00	2569	25.50	353	1380	1914	655	3	173	193	121	165
26	161	4008.00	3410	36.86	64	1190	2153	1257	5	707	109	264	172
26	161	4021.00	2917	38.84	493	1508	1784	1133	6	637	130	200	160
26	161	4022.01	5503	42.79	63	1196	3148	2355	2	1425	250	323	355
26	161	4023.00	2813	31.89	688	1144	1916	897	5	534	64	99	195
26	161	4025.00	2311	46.99	639	1144	1225	1086	1	752	57	104	172
26	161	4026.01	4091	46.17	295	505	2202	1889	2	1150	227	234	276
26	161	4027.00	5396	43.16	1538	2338	3067	2329	2	1589	188	252	298
26	161	4031.00	1542	22.05	463	573	1202	340	2	124	42	54	118
26	161	4032.00	3369	21.99	897	1312	2628	741	1	144	187	146	263
26	161	4033.00	4220	25.52	883	1720	3143	1077	4	262	309	220	282
26	161	4034.00	3114	16.86	786	1341	2589	525	2	122	84	135	182
26	161	4035.00	3026	21.74	658	1284	2368	658	9	124	163	166	196
26	161	4036.00	5818	61.09	991	2530	2264	3554	2	2773	305	189	285
26	161	4038.00	3153	45.26	677	1447	1726	1427	7	480	570	159	211
26	161	4041.00	3069	19.84	838	1363	2460	609	4	117	121	152	215
26	161	4042.00	1983	42.97	300	1159	1131	852	1	128	393	166	164
26	161	4043.00	2696	17.06	825	1186	2236	460	1	98	72	114	175
26	161	4044.00	2275	22.81	612	894	1756	519	2	198	79	99	141
26	161	4045.00	4421	42.00	796	2335	2564	1857	13	892	396	288	268
26	161	4046.00	4751	30.92	1110	2664	3282	1469	2	540	325	295	307
26	161	4051.00	2264	39.66	320	924	1366	898	0	134	342	218	204
26	161	4052.00	4897	27.28	1178	2343	3561	1336	4	575	205	251	301
26	161	4053.00	5133	25.48	1567	1978	3825	1308	8	650	90	215	345
26	161	4054.00	2048	23.44	501	985	1568	480	1	84	111	140	144
26	161	4055.00	2365	44.61	644	1108	1310	1055	10	279	410	151	205
26	161	4056.00	4544	56.23	1167	1824	1989	2555	1	765	1170	321	298
26	161	4060.00	3673	37.57	795	1381	2293	1380	3	944	115	145	173
26	161	4070.00	5215	26.42	1448	1892	3837	1378	4	672	174	184	344
26	161	4074.00	6466	63.90	1479	2316	2334	4132	14	163	2790	613	552
26	161	4076.00	3151	49.25	792	1202	1599	1552	1	210	1000	159	182
26	161	4101.00	3306	64.46	523	1631	1175	2131	6	251	1248	373	253
26	161	4102.00	3145	32.59	486	1110	2120	1025	7	155	439	192	232
26	161	4103.00	3871	27.85	665	1887	2793	1078	10	75	525	227	241
26	161	4104.00	3584	37.92	797	1371	2225	1359	10	169	661	295	224
26	161	4105.00	2153	55.83	403	1213	951	1202	1	92	805	151	153
26	161	4106.00	3007	71.93	553	1059	844	2163	0	38	1729	174	222

State Code	County Code	Tract Code	Tract Population	Tract Minority %	Number of Families	Number of Households	Non-Hisp White Population	Tract Minority Population	American Indian Population	Asian/Hawaiian/Pacific Islander Population	Black Population	Hispanic Population	Other Population/Two or More Races
26	161	4107.00	1454	52.89	214	820	685	769	7	35	549	107	71
26	161	4108.00	1711	43.54	293	756	966	745	3	36	411	156	139
26	161	4109.00	1433	19.54	269	597	1153	280	1	20	76	69	114
26	161	4110.00	2490	35.14	159	1269	1615	875	14	100	401	197	163
26	161	4112.00	2665	72.01	318	953	746	1919	15	58	1522	124	200
26	161	4117.00	2331	36.94	552	918	1470	861	5	30	517	117	192
26	161	4119.00	3743	46.33	795	1524	2009	1734	8	46	997	392	291
26	161	4120.00	3728	41.20	991	1488	2192	1536	7	63	964	214	288
26	161	4121.00	3732	46.17	747	1459	2009	1723	19	36	1071	277	320
26	161	4123.00	2990	76.82	636	1009	693	2297	9	11	1876	222	179
26	161	4126.00	2602	36.74	326	1514	1646	956	5	73	553	147	178
26	161	4127.00	4983	46.22	1234	2088	2680	2303	6	103	1538	267	389
26	161	4130.00	3635	51.69	841	1441	1756	1879	15	33	1358	164	309
26	161	4132.00	5190	43.37	1207	1634	2939	2251	15	123	1420	270	423
26	161	4134.01	4607	47.04	1152	1518	2440	2167	4	296	1288	238	341
26	161	4134.02	5586	43.77	1486	1758	3141	2445	9	206	1451	360	419
26	161	4134.03	1962	27.93	563	806	1414	548	0	92	247	99	110
26	161	4140.00	3193	60.57	573	1553	1259	1934	14	690	805	239	186
26	161	4142.00	2930	44.44	667	1508	1628	1302	11	378	436	280	197
26	161	4143.00	3025	58.05	671	1603	1269	1756	5	522	573	487	169
26	161	4145.00	3073	46.73	877	1026	1637	1436	1	605	474	129	227
26	161	4147.00	1584	32.26	378	1016	1073	511	5	259	95	84	68
26	161	4149.00	3704	47.73	1008	1311	1936	1768	0	1236	155	172	205
26	161	4152.00	2407	44.12	391	1030	1345	1062	5	386	324	188	159
26	161	4154.00	2123	33.58	322	906	1410	713	15	241	143	216	98
26	161	4156.00	2594	24.71	615	718	1953	641	5	350	88	53	145
26	161	4158.00	3608	29.85	1230	1369	2531	1077	8	610	138	130	191
26	161	4160.00	3686	49.95	848	1254	1845	1841	3	531	364	686	257
26	161	4162.00	5169	22.15	1455	1967	4024	1145	4	367	265	191	318
26	161	4200.00	3745	22.64	892	1223	2897	848	4	42	430	138	234
26	161	4202.00	3338	16.81	930	1236	2777	561	17	19	189	130	206
26	161	4211.00	3865	14.36	1010	1582	3310	555	14	33	84	185	239
26	161	4222.01	3582	12.56	988	1136	3132	450	3	107	30	123	187
26	161	4222.02	3923	17.95	1128	1542	3219	704	8	55	55	420	166
26	161	4234.00	6368	13.36	1908	2775	5517	851	9	204	94	225	319
26	161	4236.00	2606	14.81	602	988	2220	386	2	88	64	95	137
26	161	4250.00	4380	21.58	1314	1586	3435	945	3	177	127	398	240
26	161	4260.01	2252	11.90	576	811	1984	268	9	39	46	72	102
26	161	4260.02	2036	17.19	541	696	1686	350	4	123	30	75	118
26	161	4310.00	4626	8.69	1374	2094	4224	402	14	21	25	156	186
26	161	4320.00	4764	7.83	1395	1861	4391	373	9	39	17	106	202
26	161	4440.00	6696	8.89	1893	2362	6101	595	8	71	42	177	297
26	161	4450.00	2656	11.60	780	1022	2348	308	7	14	71	63	153
26	161	4462.00	2252	9.15	516	1222	2046	206	3	22	18	74	89
26	161	4464.00	3215	9.98	821	1340	2894	321	7	71	19	104	120

State Code	County Code	Tract Code	Tract Population	Tract Minority %	Number of Families	Number of Households	Non-Hisp White Population	Tract Minority Population	American Indian Population	Asian/Hawaiian/Pacific Islander Population	Black Population	Hispanic Population	Other Population/Two or More Races
26	161	4470.00	3311	10.63	903	1190	2959	352	9	47	43	91	162
26	161	4480.00	4024	11.93	1099	1480	3544	480	6	82	38	170	184
26	161	4530.00	5212	17.38	1725	1963	4306	906	8	357	103	145	293
26	161	4540.01	1257	9.15	342	443	1142	115	2	18	15	30	50
26	161	4540.02	3719	12.85	910	1489	3241	478	3	110	20	174	171
26	161	4550.00	5072	33.71	1216	1747	3362	1710	6	521	296	464	423
26	161	4560.00	5914	36.03	1621	2426	3783	2131	6	1017	373	340	395
26	161	4610.00	7371	10.20	2387	2839	6619	752	16	123	41	206	366
26	161	4640.00	7018	14.06	1720	2050	6031	987	24	133	232	244	354
26	161	4650.01	2136	11.56	519	739	1889	247	13	11	20	101	102
26	161	4650.02	3810	12.26	1080	1869	3343	467	14	34	46	142	231
26	161	4660.00	2604	10.56	716	927	2329	275	4	55	16	80	120
26	161	9801.01	6052	35.03	52	457	3932	2120	12	949	561	333	265
26	161	9801.02	3713	25.07	0	189	2782	931	1	157	433	123	217
26	161	9802.00	0	0.00	0	0	0	0	0	0	0	0	0
26	161	9803.00	2012	42.54	0	0	1156	856	48	11	713	64	20
26	161	9804.00	0	0.00	0	0	0	0	0	0	0	0	0
26	161	9805.00	2376	29.80	0	14	1668	708	4	201	158	147	198
26	161	9806.00	1603	62.51	9	9	601	1002	19	17	831	128	7
26	161	9840.00	34	61.76	11	15	13	21	2	0	1	6	12

2023 FFIEC Census Report - Summary Census Housing Information

MSA/MD: 11460 - ANN ARBOR, MI

State: 26 - MICHIGAN (MI)



State Code	County Code	Tract Code	Total Housing Units	1- to 4-Family Units	Median House Age (Years)	Inside Principal City?	Owner Occupied Units	Vacant Units	Owner Occupied 1- to 4- Family Units	Renter Occupied Units
26	161	4001.00	1485	80	31	Yes	239	203	11	1043
26	161	4003.00	1426	406	50	Yes	186	100	186	1140
26	161	4004.00	1262	1110	0	Yes	890	52	871	320
26	161	4005.00	2807	1306	59	Yes	67	254	52	2486
26	161	4006.00	2220	1469	73	Yes	881	123	854	1216
26	161	4007.00	1457	1070	0	Yes	424	77	412	956
26	161	4008.00	1301	475	72	Yes	55	111	39	1135
26	161	4021.00	1623	688	54	Yes	417	115	353	1091
26	161	4022.01	1411	89	32	Yes	34	215	17	1162
26	161	4023.00	1233	874	42	Yes	963	89	781	181
26	161	4025.00	1144	467	46	Yes	468	0	453	676
26	161	4026.01	574	453	44	Yes	131	69	131	374
26	161	4027.00	2619	2070	38	Yes	1318	281	1270	1020
26	161	4031.00	609	605	45	Yes	565	36	565	8
26	161	4032.00	1382	1377	62	Yes	983	70	983	329
26	161	4033.00	1779	1498	51	Yes	1153	59	1153	567
26	161	4034.00	1384	1306	66	Yes	1070	43	1070	271
26	161	4035.00	1377	1133	64	Yes	670	93	670	614
26	161	4036.00	2623	1263	33	Yes	697	93	683	1833
26	161	4038.00	1494	1200	46	Yes	872	47	833	575
26	161	4041.00	1410	1139	62	Yes	914	47	914	449
26	161	4042.00	1175	381	41	Yes	363	16	159	796
26	161	4043.00	1223	1176	62	Yes	1132	37	1085	54
26	161	4044.00	960	837	42	Yes	693	66	693	201
26	161	4045.00	2385	418	30	Yes	288	50	189	2047
26	161	4046.00	2720	1803	49	Yes	1196	56	1138	1468
26	161	4051.00	1012	821	50	Yes	451	88	451	473
26	161	4052.00	2398	1717	55	Yes	1358	55	1287	985
26	161	4053.00	2011	1825	60	Yes	1705	33	1697	273
26	161	4054.00	1026	989	72	Yes	856	41	819	129
26	161	4055.00	1108	1044	50	Yes	849	0	839	259
26	161	4056.00	1880	1256	46	Yes	296	56	296	1528
26	161	4060.00	1433	1103	31	Yes	881	52	881	500
26	161	4070.00	1956	1868	28	No	1663	64	1663	229
26	161	4074.00	2414	1958	33	No	1507	98	1507	809
26	161	4076.00	1343	1226	28	No	1162	141	1135	40
26	161	4101.00	1713	105	40	No	21	82	9	1610
26	161	4102.00	1198	550	46	No	481	88	419	629
26	161	4103.00	1924	1467	0	No	878	37	728	1009
26	161	4104.00	1428	1137	52	No	1041	57	1033	330
26	161	4105.00	1258	516	40	No	342	45	324	871
26	161	4106.00	1210	976	51	No	361	151	361	698

State Code	County Code	Tract Code	Total Housing Units	1- to 4- Family Units	Median House Age (Years)	Inside Principal City?	Owner Occupied Units	Vacant Units	Owner Occupied 1- to 4- Family Units	Renter Occupied Units
26	161	4107.00	893	566	74	No	231	73	226	589
26	161	4108.00	797	484	67	No	240	41	236	516
26	161	4109.00	624	600	76	No	491	27	491	106
26	161	4110.00	1376	487	0	No	105	107	105	1164
26	161	4112.00	1124	151	38	No	10	171	10	943
26	161	4117.00	963	963	64	No	866	45	866	52
26	161	4119.00	1651	999	63	No	527	127	527	997
26	161	4120.00	1553	1282	61	No	863	65	863	625
26	161	4121.00	1497	1297	55	No	984	38	977	475
26	161	4123.00	1125	1125	60	No	632	116	632	377
26	161	4126.00	1670	244	42	No	229	156	33	1285
26	161	4127.00	2158	1277	41	No	1086	70	993	1002
26	161	4130.00	1558	1328	53	No	838	117	838	603
26	161	4132.00	1683	1615	20	No	1106	49	1085	528
26	161	4134.01	1553	1553	21	No	1438	35	1438	80
26	161	4134.02	1780	1780	20	No	1666	22	1666	92
26	161	4134.03	830	830	37	No	766	24	766	40
26	161	4140.00	1646	105	39	No	10	93	10	1543
26	161	4142.00	1607	736	50	Yes	567	99	567	941
26	161	4143.00	1696	620	36	No	416	93	376	1187
26	161	4145.00	1040	1040	31	No	983	14	983	43
26	161	4147.00	1094	607	24	Yes	495	78	420	521
26	161	4149.00	1435	1249	24	Yes	1114	124	1077	197
26	161	4152.00	1089	296	33	No	135	59	135	895
26	161	4154.00	1025	510	19	Yes	608	119	355	298
26	161	4156.00	761	635	19	No	620	43	620	98
26	161	4158.00	1383	1383	24	No	1350	14	1350	19
26	161	4160.00	1300	1300	25	No	1210	46	1210	44
26	161	4162.00	2005	1677	24	No	1603	38	1478	364
26	161	4200.00	1250	1250	35	No	1149	27	1149	74
26	161	4202.00	1268	1268	33	No	1135	32	1135	101
26	161	4211.00	1714	1567	63	No	1089	132	1089	493
26	161	4222.01	1228	1228	28	No	1086	92	1086	50
26	161	4222.02	1542	1542	50	No	1363	0	1363	179
26	161	4234.00	2877	2484	37	No	2245	102	2245	530
26	161	4236.00	1003	759	49	No	605	15	597	383
26	161	4250.00	1715	1715	33	No	1553	129	1553	33
26	161	4260.01	820	820	26	No	750	9	750	61
26	161	4260.02	723	723	30	No	682	27	682	14
26	161	4310.00	2264	2141	42	No	1763	170	1743	331
26	161	4320.00	2051	2047	46	No	1733	190	1729	128
26	161	4440.00	2587	2572	36	No	2230	225	2230	132
26	161	4450.00	1259	1250	40	No	985	237	981	37
26	161	4462.00	1247	928	59	No	649	25	580	573
26	161	4464.00	1340	1148	27	No	1003	0	994	337
26	161	4470.00	1287	1282	28	No	1097	97	1097	93

State Code	County Code	Tract Code	Total Housing Units	1- to 4- Family Units	Median House Age (Years)	Inside Principal City?	Owner Occupied Units	Vacant Units	Owner Occupied 1- to 4- Family Units	Renter Occupied Units
26	161	4480.00	1550	1550	35	No	1269	70	1269	211
26	161	4530.00	2100	2100	44	Yes	1897	137	1897	66
26	161	4540.01	450	450	43	No	416	7	416	27
26	161	4540.02	1570	1243	26	No	1051	81	1025	438
26	161	4550.00	1861	1773	24	No	1332	114	1314	415
26	161	4560.00	2630	2013	21	No	1863	204	1704	563
26	161	4610.00	3023	3023	26	No	2733	184	2733	106
26	161	4640.00	2337	2337	30	No	1781	287	1781	269
26	161	4650.01	871	871	26	No	638	132	638	101
26	161	4650.02	1936	1649	36	No	1274	67	1274	595
26	161	4660.00	980	980	43	No	842	53	842	85
26	161	9801.01	712	67	44	Yes	0	255	0	457
26	161	9801.02	189	57	52	Yes	0	0	0	189
26	161	9802.00	0	0	0	No	0	0	0	0
26	161	9803.00	0	0	0	No	0	0	0	0
26	161	9804.00	0	0	0	Yes	0	0	0	0
26	161	9805.00	34	0	43	No	0	20	0	14
26	161	9806.00	9	9	0	No	0	0	0	9
26	161	9840.00	15	15	0	No	15	0	15	0

SECTION H
CRA DISCLOSURE STATEMENTS

HMDA Disclosure Statement

“Banks required to report Home Mortgage Disclosure Act (HMDA) data. A bank required to report home mortgage loan data pursuant part 1003 of this title shall include in its public file a written notice that the institution's HMDA Disclosure Statement may be obtained on the Consumer Financial Protection Bureau's (Bureau's) Web site at www.consumerfinance.gov/hmda. In addition, a bank that elected to have the FDIC consider the mortgage lending of an affiliate shall include in its public file the name of the affiliate and a written notice that the affiliate's HMDA Disclosure Statement may be obtained at the Bureau's Web site. The bank shall place the written notice(s) in the public file within three business days after receiving notification from the Federal Financial Institutions Examination Council of the availability of the disclosure statement(s). “

Notice

- University Bank’s HMDA Disclosure Statement may be obtained on the Consumer Financial Protection Bureau’s (Bureau's) Web site at www.consumerfinance.gov/hmda.
- UIF Corporation’s LLC’s HMDA Disclosure Statement may be obtained on the Consumer Financial Protection Bureau’s (Bureau's) Web site at www.consumerfinance.gov/hmda.

Disposition of loan applications, by location of property and type of loan, 2022

MSA/MD: 11460 - Ann Arbor, MI

CENSUS TRACT OR COUNTY NAME AND DISF Loans on 1- to 4-Family and Manufactured Home Dwellings

	Home Purchase Loans													
	FHA, FSA/RHS & VA;		Conventional		Refinancings		Home Improvement L Loans on Dwellings Fo		Nonoccupant Loans Fr		Loans On Manufactured Home Dwellings From Columns A, B, C, & D			
	A	B	C	D	E	F	G							
	Number	\$	Number	\$	Number	\$	Number	\$	Number	\$	Number	\$	Number	\$
Washtenaw County/Michigan/400400														
Loans Originated	0	0	1	845000	0	0	0	0	0	0	0	0	0	0
Applications Approved but not Accepted	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applications Denied by Financial Institution	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applications Withdrawn by Applicant	0	0	0	0	0	0	0	0	0	0	0	0	0	0
File Closed for Incompleteness	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applications Received	0	0	1	845000	0	0	0	0	0	0	0	0	0	0
Washtenaw County/Michigan/400500														
Loans Originated	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applications Approved but not Accepted	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applications Denied by Financial Institution	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applications Withdrawn by Applicant	0	0	0	0	0	0	0	0	0	0	0	0	0	0
File Closed for Incompleteness	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applications Received	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Washtenaw County/Michigan/400600														
Loans Originated	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applications Approved but not Accepted	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applications Denied by Financial Institution	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applications Withdrawn by Applicant	0	0	0	0	0	0	0	0	0	0	0	0	0	0
File Closed for Incompleteness	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applications Received	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Washtenaw County/Michigan/400700														
Loans Originated	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applications Approved but not Accepted	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applications Denied by Financial Institution	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applications Withdrawn by Applicant	0	0	0	0	0	0	0	0	0	0	0	0	0	0
File Closed for Incompleteness	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applications Received	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Washtenaw County/Michigan/402100														
Loans Originated	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applications Approved but not Accepted	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applications Denied by Financial Institution	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applications Withdrawn by Applicant	0	0	0	0	0	0	0	0	0	0	0	0	0	0
File Closed for Incompleteness	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applications Received	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Washtenaw County/Michigan/402300														
Loans Originated	0	0	1	705000	0	0	0	0	0	0	0	0	0	0
Applications Approved but not Accepted	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applications Denied by Financial Institution	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applications Withdrawn by Applicant	0	0	0	0	0	0	0	0	0	0	0	0	0	0
File Closed for Incompleteness	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applications Received	0	0	1	705000	0	0	0	0	0	0	0	0	0	0
Washtenaw County/Michigan/402700														
Loans Originated	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applications Approved but not Accepted	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applications Denied by Financial Institution	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applications Withdrawn by Applicant	0	0	2	790000	0	0	0	0	0	0	0	0	0	0
File Closed for Incompleteness	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applications Received	0	0	2	790000	0	0	0	0	0	0	0	0	0	0
Washtenaw County/Michigan/403200														
Loans Originated	0	0	2	680000	0	0	0	0	0	0	0	0	0	0

Loans by County

MSA: 11460

Small Business Loans - Originations

ANN ARBOR, MI

MSA Income Characteristics	Loan Amount at Origination <= \$100,000		Loan Amount at Origination > \$100,000 But <= \$250,000		Loan Amount at Origination > \$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million	
	Num of loans	Amount (000s)	Num of loans	Amount (000s)	Num of loans	Amount (000s)	Num of loans	Amount (000s)
WASHTENAW COUNTY (161), MI								
Low Income								
4022.01	11	147	0	0	0	0	3	32
4042.00	35	464	1	250	0	0	16	104
4056.00	108	1,597	2	352	2	1,200	54	638
4074.00	52	366	1	104	0	0	34	304
4101.00	39	777	0	0	0	0	17	173
4105.00	27	208	0	0	0	0	12	120
4106.00	27	225	0	0	1	700	12	42
4107.00	57	807	1	150	5	1,897	28	694
4108.00	43	539	0	0	0	0	21	188
4110.00	30	360	0	0	0	0	16	136
4112.00	17	166	0	0	0	0	6	78
4123.00	20	176	0	0	0	0	16	119
4140.00	53	636	0	0	0	0	30	200
Subtotal for Income Group	519	6,468	5	856	8	3,797	265	2,828
Moderate Income								
4026.01	46	628	0	0	0	0	19	219
4045.00	164	2,446	4	701	4	2,034	78	800
4051.00	22	200	0	0	1	560	12	80
4117.00	15	130	0	0	0	0	8	44
4119.00	52	648	6	975	6	2,834	31	1,240
4120.00	68	1,016	1	155	1	281	43	809
4121.00	37	547	0	0	1	259	27	382
4126.00	27	235	0	0	0	0	11	82
4130.00	28	274	6	1,242	0	0	21	222

Loans by County

MSA: 11460

Small Business Loans - Originations

ANN ARBOR, MI

MSA Income Characteristics	Loan Amount at Origination <= \$100,000		Loan Amount at Origination > \$100,000 But <= \$250,000		Loan Amount at Origination > \$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million	
	Num of loans	Amount (000s)	Num of loans	Amount (000s)	Num of loans	Amount (000s)	Num of loans	Amount (000s)
4142.00	81	1,046	0	0	2	1,693	40	398
4152.00	44	403	1	150	1	433	24	638
4211.00	42	716	2	353	0	0	20	396
4650.01	17	236	1	150	1	300	5	325
Subtotal for Income Group	643	8,525	21	3,726	17	8,394	339	5,635
Middle Income								
4021.00	57	561	1	160	0	0	35	289
4033.00	122	1,613	1	150	3	1,656	66	1,983
4035.00	88	1,414	3	599	2	1,394	48	1,111
4036.00	99	1,172	3	668	0	0	50	829
4038.00	40	522	1	117	0	0	26	185
4046.00	181	2,752	15	2,609	12	5,306	81	1,470
4054.00	81	1,075	1	150	6	3,194	39	1,079
4055.00	68	669	3	498	1	385	37	916
4076.00	31	267	0	0	0	0	17	151
4102.00	37	315	3	650	0	0	18	263
4103.00	137	1,778	3	524	1	257	73	1,284
4104.00	93	865	1	245	0	0	50	735
4109.00	17	160	0	0	0	0	11	95
4127.00	66	879	0	0	0	0	36	290
4132.00	54	421	1	136	2	750	35	233
4134.01	69	613	0	0	0	0	36	285
4134.02	81	978	1	112	0	0	45	485
4134.03	102	1,387	5	916	3	2,057	68	2,071
4143.00	38	394	3	634	2	824	22	1,073
4147.00	74	1,581	4	857	5	3,144	23	748

Loans by County

MSA: 11460

Small Business Loans - Originations

ANN ARBOR, MI

MSA Income Characteristics	Loan Amount at Origination <= \$100,000		Loan Amount at Origination > \$100,000 But <= \$250,000		Loan Amount at Origination > \$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million	
	Num of loans	Amount (000s)	Num of loans	Amount (000s)	Num of loans	Amount (000s)	Num of loans	Amount (000s)
4154.00	100	1,951	5	826	7	3,972	48	562
4160.00	72	693	3	404	2	1,659	43	1,358
4200.00	72	950	1	115	0	0	45	459
4202.00	58	654	0	0	1	326	41	602
4222.02	96	1,173	0	0	1	500	57	512
4234.00	162	2,747	4	747	11	6,600	80	3,714
4236.00	50	705	0	0	0	0	31	461
4260.01	35	623	0	0	1	300	12	198
4260.02	52	759	1	200	0	0	28	504
4310.00	64	792	2	450	1	750	39	382
4320.00	107	1,204	1	200	1	775	62	521
4450.00	38	361	1	240	0	0	26	164
4462.00	61	956	2	415	1	332	33	964
4470.00	53	619	3	633	1	800	37	1,357
4480.00	77	1,117	1	200	1	269	43	721
4540.02	108	1,603	8	1,408	5	3,113	59	2,766
4550.00	254	4,898	10	1,796	11	4,819	94	3,554
4640.00	189	2,717	3	371	7	2,718	108	1,297
4650.02	64	594	3	659	4	2,234	42	722
4660.00	78	1,074	3	475	1	400	37	336
Subtotal for Income Group	3,325	45,606	100	18,164	93	48,534	1,781	36,729
Upper Income								
4001.00	246	3,802	13	2,236	10	5,392	103	3,002
4004.00	58	776	1	244	1	501	32	1,082
4006.00	83	1,102	4	648	6	3,735	42	1,591
4007.00	111	1,745	6	1,099	3	1,768	58	1,840

Loans by County

MSA: 11460

Small Business Loans - Originations

ANN ARBOR, MI

MSA Income Characteristics	Loan Amount at Origination <= \$100,000		Loan Amount at Origination > \$100,000 But <= \$250,000		Loan Amount at Origination > \$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million	
	Num of loans	Amount (000s)	Num of loans	Amount (000s)	Num of loans	Amount (000s)	Num of loans	Amount (000s)
4023.00	47	707	0	0	0	0	25	262
4025.00	57	626	3	463	1	251	37	483
4027.00	74	841	1	121	0	0	40	524
4031.00	39	442	1	202	0	0	29	554
4032.00	91	1,145	0	0	3	2,265	55	1,256
4034.00	32	247	3	490	3	1,205	25	1,277
4041.00	44	515	1	250	0	0	28	493
4043.00	50	571	4	819	0	0	29	747
4044.00	37	309	2	390	0	0	26	539
4052.00	113	1,368	2	332	1	275	59	858
4053.00	168	2,422	5	887	9	4,777	87	3,344
4060.00	102	1,392	3	485	0	0	55	654
4070.00	160	2,254	5	971	7	4,133	90	3,196
4145.00	93	1,366	2	286	0	0	50	447
4149.00	123	1,397	3	650	4	1,455	63	1,394
4156.00	79	1,214	7	1,348	6	3,532	42	1,532
4158.00	83	1,080	0	0	3	1,264	45	1,157
4162.00	112	1,057	1	187	0	0	66	547
4222.01	90	1,395	1	162	1	332	44	524
4250.00	106	1,684	6	877	2	900	52	1,215
4440.00	99	1,198	2	304	1	350	62	1,073
4464.00	66	593	2	443	0	0	40	337
4530.00	140	1,599	1	250	0	0	80	912
4540.01	30	573	3	551	2	666	9	106
4560.00	247	3,228	11	1,958	13	7,168	135	5,160
4610.00	145	1,806	3	534	0	0	93	1,219

Loans by County

MSA: 11460

Small Business Loans - Originations

ANN ARBOR, MI

MSA Income Characteristics	Loan Amount at Origination <= \$100,000		Loan Amount at Origination > \$100,000 But <= \$250,000		Loan Amount at Origination > \$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million	
	Num of loans	Amount (000s)	Num of loans	Amount (000s)	Num of loans	Amount (000s)	Num of loans	Amount (000s)
Subtotal for Income Group	2,925	38,454	96	17,187	76	39,969	1,601	37,325
Income Not Known								
4003.00	15	184	1	115	1	395	9	657
4005.00	23	301	3	461	1	750	11	1,002
4008.00	14	207	1	152	0	0	3	20
9801.01	32	644	3	549	0	0	16	461
9801.02	2	48	0	0	0	0	1	32
9802.00	27	536	2	375	2	1,600	14	1,190
9805.00	2	23	0	0	0	0	1	1
9806.00	1	25	0	0	0	0	0	0
9840.00	8	156	4	808	3	2,284	5	145
Subtotal for Income Group	124	2,124	14	2,460	7	5,029	60	3,508
Tract Not Known								
Subtotal for Income Group	31	368	0	0	0	0	7	52
County Total	7,567	101,545	236	42,393	201	105,723	4,053	86,077

Home Mortgage Disclosure Act Institution Register Summary for 2022
 Nationwide
 Institution: 549300IFOE4SCP384147

MSA/MD	MSA/MD Name	Total Lars	Total Amount		CONV	FHA	VA	FSA	Site Built	Manufactured	1-4 units	5+ units	Home		Cash-out		Other	Purpose	
			(\$000's)										Purchase	Improvement	Refinancing	Refinancing	Purpose	N/A	
16984	Chicago-Naperville-Evanston, IL	1	405	1	0	0	0	0	1	0	1	0	1	0	0	0	0	0	0
34820	Myrtle Beach-Conway-North Myrtle Beach, SC-NC	1	245	1	0	0	0	0	1	0	1	0	1	0	0	0	0	0	0
27260	Jacksonville, FL	2	640	2	0	0	0	0	2	0	2	0	2	0	0	0	0	0	0
19804	Detroit-Dearborn-Livonia, MI	51	9595	45	5	0	1	51	0	51	0	40	2	5	1	3	0	0	
24340	Grand Rapids-Kentwood, MI	3	465	3	0	0	0	3	0	3	0	3	0	0	0	0	0	0	
99999	Adrian, MI	72	15480	48	9	4	11	71	1	72	0	67	0	3	1	1	0	0	
45220	Tallahassee, FL	153	39445	94	44	13	2	150	3	153	0	142	1	3	5	2	0	0	
15980	Cape Coral-Fort Myers, FL	3	1745	3	0	0	0	3	0	3	0	3	0	0	0	0	0	0	
11460	Ann Arbor, MI	169	54515	160	5	2	2	169	0	168	1	146	6	6	5	6	0	0	
37460	Panama City, FL	2	450	1	0	1	0	2	0	2	0	2	0	0	0	0	0	0	
39580	Raleigh-Cary, NC	1	345	1	0	0	0	1	0	1	0	1	0	0	0	0	0	0	
23844	Gary, IN	94	22870	76	12	5	1	94	0	94	0	90	0	1	3	0	0	0	
19124	Dallas-Plano-Irving, TX	1	335	1	0	0	0	1	0	1	0	1	0	0	0	0	0	0	
25860	Hickory-Lenoir-Morganton, NC	1	305	1	0	0	0	1	0	1	0	1	0	0	0	0	0	0	
23540	Gainesville, FL	2	440	2	0	0	0	2	0	2	0	1	0	0	1	0	0	0	
18880	Crestview-Fort Walton Beach-Destin, FL	48	18280	24	3	21	0	48	0	48	0	44	0	0	3	1	0	0	
37340	Palm Bay-Melbourne-Titusville, FL	1	205	1	0	0	0	1	0	1	0	1	0	0	0	0	0	0	
12540	Bakersfield, CA	1	605	1	0	0	0	1	0	1	0	1	0	0	0	0	0	0	
29200	Lafayette-West Lafayette, IN	2	240	2	0	0	0	2	0	2	0	2	0	0	0	0	0	0	
34940	Naples-Marco Island, FL	1	685	1	0	0	0	1	0	1	0	1	0	0	0	0	0	0	
33460	Minneapolis-St. Paul-Bloomington, MN-WI	1	275	1	0	0	0	1	0	1	0	1	0	0	0	0	0	0	
46660	Valdosta, GA	1	215	0	1	0	0	1	0	1	0	1	0	0	0	0	0	0	
25940	Hilton Head Island-Bluffton, SC	2	650	2	0	0	0	2	0	2	0	2	0	0	0	0	0	0	
29620	Lansing-East Lansing, MI	3	645	3	0	0	0	3	0	3	0	3	0	0	0	0	0	0	
40140	Riverside-San Bernardino-Ontario, CA	2	1020	2	0	0	0	2	0	2	0	2	0	0	0	0	0	0	
35840	North Port-Sarasota-Bradenton, FL	2	610	2	0	0	0	2	0	2	0	2	0	0	0	0	0	0	
34980	Nashville-Davidson--Murfreesboro--Franklin, TN	3	1255	2	0	1	0	3	0	3	0	2	0	0	0	1	0	0	
33780	Monroe, MI	5	1635	4	1	0	0	5	0	5	0	3	0	1	1	0	0	0	
22420	Flint, MI	2	470	1	1	0	0	2	0	2	0	2	0	0	0	0	0	0	
31084	Los Angeles-Long Beach-Glendale, CA	8	5090	5	1	2	0	8	0	8	0	4	0	2	2	0	0	0	
41660	San Angelo, TX	9	2275	5	2	2	0	9	0	9	0	9	0	0	0	0	0	0	
12060	Atlanta-Sandy Springs-Alpharetta, GA	2	670	0	2	0	0	2	0	2	0	2	0	0	0	0	0	0	
27100	Jackson, MI	17	3125	15	1	1	0	17	0	14	3	17	0	0	0	0	0	0	
35660	Niles, MI	1	185	1	0	0	0	1	0	1	0	1	0	0	0	0	0	0	
36100	Ocala, FL	1	65	1	0	0	0	1	0	1	0	1	0	0	0	0	0	0	
37860	Pensacola-Ferry Pass-Brent, FL	110	38090	60	20	29	1	110	0	110	0	100	1	4	5	0	0	0	
48424	West Palm Beach-Boca Raton-Boynton Beach, FL	1	535	1	0	0	0	1	0	1	0	1	0	0	0	0	0	0	
47664	Warren-Troy-Farmington Hills, MI	77	17815	69	8	0	0	77	0	76	1	65	4	3	3	2	0	0	
36740	Orlando-Kissimmee-Sanford, FL	2	620	2	0	0	0	2	0	2	0	2	0	0	0	0	0	0	
11244	Anaheim-Santa Ana-Irvine, CA	1	415	1	0	0	0	1	0	1	0	0	0	1	0	0	0	0	
39460	Punta Gorda, FL	1	135	1	0	0	0	1	0	1	0	1	0	0	0	0	0	0	
47894	Washington-Arlington-Alexandria, DC-VA-MD-WV	1	265	1	0	0	0	1	0	1	0	1	0	0	0	0	0	0	
45300	Tampa-St. Petersburg-Clearwater, FL	6	2210	4	0	2	0	6	0	6	0	6	0	0	0	0	0	0	
19660	Deltona-Daytona Beach-Ormond Beach, FL	1	265	1	0	0	0	1	0	1	0	1	0	0	0	0	0	0	
22744	Fort Lauderdale-Pompano Beach-Sunrise, FL	1	365	1	0	0	0	1	0	1	0	0	0	0	1	0	0	0	
23420	Fresno, CA	1	345	0	1	0	0	1	0	1	0	1	0	0	0	0	0	0	
23224	Frederick-Gaithersburg-Rockville, MD	1	615	1	0	0	0	1	0	1	0	1	0	0	0	0	0	0	
41740	San Diego-Chula Vista-Carlsbad, CA	1	525	1	0	0	0	1	0	1	0	0	0	1	0	0	0	0	
33140	Michigan City-La Porte, IN	1	185	1	0	0	0	1	0	1	0	1	0	0	0	0	0	0	
26900	Indianapolis-Carmel-Anderson, IN	3	825	2	0	0	1	3	0	3	0	3	0	0	0	0	0	0	
Totals		876	248690	658	116	83	19	872	4	871	5	785	14	30	31	16	0	0	